

STATE OF LOUISIANA

DEPARTMENT OF ENVIRONMENTAL QUALITY

IN THE MATTER OF:

VALERO REFINING-NEW ORLEANS, L.L.C.

AI # 26003

PROCEEDINGS UNDER THE LOUISIANA
ENVIRONMENTAL QUALITY ACT

LA. R.S. 30:2001, ET SEQ.

* Settlement Tracking No.
* SA-AE-21-0019
* Enforcement Tracking No.
* AE-CN-16-00273
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SETTLEMENT

The following Settlement is hereby agreed to between Valero Refining-New Orleans, L.L.C. (“Respondent”) and the Department of Environmental Quality (“DEQ” or “the Department”), under authority granted by the Louisiana Environmental Quality Act, La. R.S. 30:2001, et seq. (“the Act”).

I

Respondent is a limited liability company that owns and/or operates a petroleum refinery and terminal located in Norco, St. Charles Parish, Louisiana (“the Facility”).

II

On February 5, 2019, the Department issued to Respondent a Consolidated Compliance Order & Notice of Potential Penalty, Enforcement No. AE-CN-16-00273 (Exhibit 1).

III

Respondent denies it committed any violations or that it is liable for any fines, forfeitures and/or penalties.

IV

Nonetheless, Respondent, without making any admission of liability under state or federal

statute or regulation, agrees to pay, and the Department agrees to accept, a payment in the amount of ONE HUNDRED TEN THOUSAND AND NO/100 DOLLARS (\$110,000.00), of which Six Thousand Eight Hundred Ninety and 86/100 Dollars (\$6,890.86) represents the Department's enforcement costs, in settlement of the claims set forth in this agreement.

V

Respondent, in addition to the penalty amount specified in Paragraph IV above and as part of this Settlement, agrees to expend the amount of FORTY-THOUSAND AND NO/100 DOLLARS (\$40,000.00) to implement and/or perform the following beneficial environmental projects:

A. (1) LDEQ Mercury Risk Reduction Effort – Within thirty (30) days from notice of the secretary's signature on this Settlement Agreement, the Respondent shall make a cash payment to the Department in the amount of TWENTY THOUSAND AND NO/100 DOLLARS (\$20,000.00) to assist with funding the Department's Mercury Initiative Program. The funds shall be deposited in a dedicated escrow account and administered by the Department.

(2) Pontchartrain Conservancy (formerly the Lake Pontchartrain Basin Foundation) – Within sixty (60) days from notice of the secretary's signature on this Settlement Agreement, the Respondent shall make a cash payment through act of donation in the amount of TWENTY THOUSAND AND NO/100 DOLLARS (\$20,000.00) to the Pontchartrain Conservancy for the completion of swamp restoration in area wetlands. The goal is to implement an important feature of the Multiple Lines of Defense Strategy (MLODS); MLODS features healthy wetlands as an integral part of southeast Louisiana's defense against hurricane storm surge.

The Respondent shall submit proof of payment to the Department within fourteen (14) business days after the funds are deposited in an appropriate account administered by the Pontchartrain Conservancy.

- B. If Respondent's donations and expenditures do not, in the aggregate, equal the amount of \$40,000.00, then Respondent shall propose additional projects for the Department's approval in an amount equal to the difference between the amount of money agreed to be spent and the amount of money actually spent, or pay to the Department the unexpended sum as a civil penalty.
- C. The total amount of money expended by Respondent on cash payments to the Department and on beneficial environmental projects, as described above, shall be considered a civil penalty for tax purposes, as required by La. R.S. 30: 2050.7(E)(1).

VI

Respondent further agrees that the Department may consider the permit record(s), the Consolidated Compliance Order & Notice of Potential Penalty and this Settlement for the purpose of determining compliance history in connection with any future enforcement or permitting action by the Department against Respondent, and in any such action Respondent shall be estopped from objecting to the above-referenced documents being considered as proving the violations alleged herein for the sole purpose of determining Respondent's compliance history.

VII

This agreement shall be considered a final order of the Secretary for all purposes, including, but not limited to, enforcement under La. R.S. 30:2025(G)(2), and Respondent hereby waives any right to administrative or judicial review of the terms of this agreement, except such review as may be required for interpretation of this agreement in any action by the Department to enforce this

agreement.

VIII

This settlement is being made in the interest of settling the state's claims and avoiding for both parties the expense and effort involved in litigation or an adjudicatory hearing. In agreeing to the compromise and settlement, the Department considered the factors for issuing civil penalties set forth in La. R. S. 30:2025(E) of the Act.

IX

As required by law, the Department has submitted this Settlement Agreement to the Louisiana Attorney General for approval or rejection. The Attorney General's concurrence is appended to this Settlement Agreement.

X

The Respondent has caused a public notice advertisement to be placed in the official journal of the parish governing authority in St. Charles Parish, Louisiana. The advertisement, in form and wording approved by the Department, announced the availability of this settlement for public view and comment and the opportunity for a public hearing. Respondent has submitted an original proof-of-publication affidavit and an original public notice to the Department and, as of the date this Settlement is executed on behalf of the Department, more than forty-five (45) days have elapsed since publication of the notice.

XI

Payment is to be made within ten (10) days from notice of the Secretary's signature. If payment is not received within that time, this Agreement is voidable at the option of the Department. Payments are to be made by check, payable to the Department of Environmental Quality, and mailed or delivered to the attention of Accountant Administrator, Financial Services

Division, Department of Environmental Quality, Post Office Box 4303, Baton Rouge, Louisiana, 70821-4303. Each payment shall be accompanied by a completed Settlement Payment Form (Exhibit A).

XII

In consideration of the above, any claims for penalties are hereby compromised and settled in accordance with the terms of this Settlement.

XIII

Each undersigned representative of the parties certifies that he or she is fully authorized to execute this Settlement Agreement on behalf of his or her respective party, and to legally bind such party to its terms and conditions.

VALERO REFINING-NEW ORLEANS,
L.L.C.

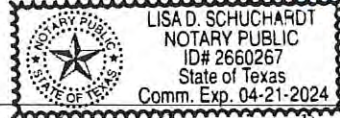
BY: *Jerry D. Stumbo*
(Signature)

Jerry D. Stumbo
(Printed)

TITLE: Vice President and General Manager

THUS DONE AND SIGNED in duplicate original before me this 14 day of
June, 20 21, at 3:20 pm.

Lisa D. Schuchardt
NOTARY PUBLIC (ID # 2660267)



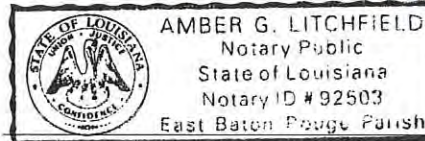
(stamped or printed)

LOUISIANA DEPARTMENT OF
ENVIRONMENTAL QUALITY
Chuck Carr Brown, Ph.D., Secretary

BY: *Le*
Lourdes Iturralde, Assistant Secretary
Office of Environmental Compliance

THUS DONE AND SIGNED in duplicate original before me this 17th day of
September, 20 21, at Baton Rouge, Louisiana.

NOTARY PUBLIC (ID # 92503)



(stamped or printed)

Approved: *Le*
Lourdes Iturralde, Assistant Secretary

JOHN BEL EDWARDS
GOVERNOR



CHUCK CARR BROWN, Ph.D.
SECRETARY

State of Louisiana
DEPARTMENT OF ENVIRONMENTAL QUALITY
OFFICE OF ENVIRONMENTAL COMPLIANCE

February 5, 2019

CERTIFIED MAIL (7004 2510 0005 5763 0560)
RETURN RECEIPT REQUESTED

VALERO REFINING-NEW ORLEANS, L.L.C.
c/o C T Corporation Service
Agent for Service of Process
3867 Plaza Tower Drive
Baton Rouge, Louisiana 70816

**RE: CONSOLIDATED COMPLIANCE ORDER
& NOTICE OF POTENTIAL PENALTY
ENFORCEMENT TRACKING NO. AE-CN-16-00273
AGENCY INTEREST NO. 26003**

Dear Sir:

Pursuant to the Louisiana Environmental Quality Act (La. R.S. 30:2001, et seq.), the attached **CONSOLIDATED COMPLIANCE ORDER & NOTICE OF POTENTIAL PENALTY** is hereby served on **VALERO REFINING-NEW ORLEANS, L.L.C. (RESPONDENT)** for the violation(s) described therein.

Compliance is expected within the maximum time period established by each part of the **COMPLIANCE ORDER**. The violation(s) cited in the **CONSOLIDATED COMPLIANCE ORDER & NOTICE OF POTENTIAL PENALTY** could result in the issuance of a civil penalty or other appropriate legal actions.

Any questions concerning this action should be directed to Antoinette Cobb at (225) 219-3072 or via email at antoinette.cobb@la.gov.

Sincerely,

A handwritten signature in black ink, appearing to read "Celena J. Cage".

Celena J. Cage
Administrator
Enforcement Division

CJC/AFC/afc
Alt ID No. 2520-00027
Attachment



c: Valero Refining-New Orleans, L.L.C.
c/o Mr. Andre Marquette, Manager-Environmental Engineering
14902 River Road
Norco, Louisiana 70079

**STATE OF LOUISIANA
DEPARTMENT OF ENVIRONMENTAL QUALITY
OFFICE OF ENVIRONMENTAL COMPLIANCE**

<p>IN THE MATTER OF</p> <p>VALERO REFINING-NEW ORLEANS, L.L.C.</p> <p>ST. CHARLES PARISH</p> <p>ALT. ID. NO. 2520-00027</p> <p>PROCEEDINGS UNDER THE LOUISIANA</p> <p>ENVIRONMENTAL QUALITY ACT,</p> <p>La. R.S. 30:2001, ET SEQ.</p>	<p>*</p> <p>*</p> <p>*</p> <p>*</p> <p>*</p> <p>*</p> <p>*</p> <p>*</p> <p>*</p>	<p>ENFORCEMENT TRACKING NO.</p> <p>AE-CN-16-00273</p> <p>AGENCY INTEREST NO.</p> <p>26003</p>
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CONSOLIDATED
COMPLIANCE ORDER & NOTICE OF POTENTIAL PENALTY

The following **CONSOLIDATED COMPLIANCE ORDER & NOTICE OF POTENTIAL PENALTY** is issued to **VALERO REFINING-NEW ORLEANS, L.L.C. (RESPONDENT)** by the Louisiana Department of Environmental Quality (the Department), under the authority granted by the Louisiana Environmental Quality Act (the Act), La. R.S. 30:2001, et seq., and particularly by La. R.S. 30:2025(C), 30:2050.2 and 30:2050.3(B).

FINDINGS OF FACT

I.

The Respondent owns and/or operates the St. Charles Refinery (facility), a petroleum refinery and terminal, located at 14902 River Road in Norco, St. Charles Parish, Louisiana. The Facility operates or has operated under the authority of the following Air Quality permits:

UNIT	PERMIT	ISSUE DATE	PERMIT EXPIRATION DATE
Entire Facility	2520-00027-V16	01/04/2018	01/04/2023
	2520-00027-V15	07/20/2016	10/02/2017
	2520-00027-V14	02/27/2015	10/02/2017
	2520-00027-V13	03/05/2014	10/02/2017
	2520-00027-V12	04/29/2013	10/02/2017
	2520-00027-V11	12/28/2012	10/02/2017

UNIT	PERMIT	ISSUE DATE	PERMIT EXPIRATION DATE
	2520-00027-V10	10/02/2012	10/02/2017
	2520-00027-V9AA2	02/07/2012	02/08/2012
	2520-00027-V9AA	02/07/2011	02/08/2012
	2520-00027-V9	12/31/2010	02/08/2012
	2520-00027-V8AA	03/01/2010	02/08/2012
	2520-00027-V8	11/17/2009	02/08/2012
Tanks 425-1 & 625-1	3132-V0	01/22/2015	01/22/2020
Tanks 130-2 & 130-5	3130-V0	08/18/2014	08/18/2019
Temporary Boilers	3112-V0	03/08/2013	12/31/2013
Storage Tank-Tank T-100-3	3111-V0	01/09/2013	01/09/2018
Storage Tanks-Petroleum Refinery	3099-V0	04/04/2012	04/04/2017
Prevention of Significant Deterioration Permit (PSD)	PSD-LA-826	01/04/2018	01/04/2028
	PSD-LA-619(M-13)	01/04/2018	01/04/2028
	PSD-LA-619(M-12)	07/20/2016	07/20/2026
	PSD-LA-619(M-11)	03/05/2014	03/05/2024
	PSD-LA-619(M1-0)	04/29/2013	03/04/2014
	PSD-LA-619(M-9)	12/28/2012	04/28/2013
	PSD-LA-619(M-8)	11/08/2012	12/27/2012
	PSD-LA-619(M-7)	10/02/2012	11/07/2012
	PSD-LA-619(M-6)	12/31/2010	10/01/2012

The Respondent entered into Consent Decree, Civil Action No. SA-05-CA-0569, on November 23, 2005. On or about January 29, 2018, the Consent Decree was terminated.

II.

On or about November 13, 2014, the Department completed a file review to determine the Respondent's degree of compliance with the Act, the Air Quality Regulations, and all applicable permits from January 1, 2010 through June 30, 2014. A subsequent file review was conducted on or about March 22, 2016-April 8, 2016, and December 3, 2018, to review reports and/or documents from July 1, 2013 through December 31, 2015. While the reviews are not complete, the Department noted the violations found in Paragraphs III-XIV of the Findings of Fact portion of this enforcement action.

III.

The Department received an Unauthorized Discharge Notification Report for Incident No. T165772 dated August 20, 2015, and Follow-up Unauthorized Discharge Notification Reports dated October 9, 2015, and October 30, 2015. According to the reports, on August 14, 2015, the 3700 SRU Waste Heat Exchanger, which is part of the 3700 Tail Gas Treatment Unit (EQT 0195), caused the unit to trip due to low boiler feed water. This caused excess emissions from the 3700 Sulfur Recovery Unit (SRU), the 1600 SRU (EQT 0241), and increased sulfur loading to the 1600 SRU. The Waste Heat Exchanger's low level alarm was set below the vessel's trip point for maintenance the previous August and had not been reset to the normal value. The incident occurred during the cleaning of the vessel; the water level dropped below the trip point when the vessel was drained. The Respondent determined the incident was preventable. The duration of the incident was approximately 1.76 hours and resulted in the following exceedances:

Source	Pollutants	SO ₂ Concentration (ppmv)	Permitted Limit (max lb/hr)	Estimated Losses (lb/hr)
Thermal Oxidizer, 3700 TOX (EQT 0195)	SO ₂	5.706	115.31	721.9
Thermal Oxidizer, 1600 TOX (EQT 0241)	SO ₂	1.011	115.31	187.6
TOTAL				909.5

- A. The incident is a violation of LAC 33:III.905.A and La. R.S. 30:2057(A)(2).
- B. Each exceedance of the 250 ppmv SO₂ concentration standard is a violation of 40 CFR 60.102a(f)(1)(i), Specific Requirement 847 of Title V Permit No. 2520-00027-V14, LAC 33:III.501.C.4, and La. R.S. 30:2057(A)(2).
- C. Each failure to comply with permitted emission limits is a violation of Title V Permit No. 2520-00027-V14, LAC 33:III.501.C.4, and La. R.S. 30:2057(A)(1) and 30:2057(A)(2).

IV.

The Department received an Unauthorized Discharge Notification Report for Incident No. T165942 dated September 10, 2015, and a Follow-up Unauthorized Discharge Notification Report dated November 2, 2015. According to the reports, on September 3, 2015, a boiler shutdown resulted in multiple process units upsets. The boiler, Boiler 401-E (EQT 0029), malfunctioned when water from a heavy rain event interfered with an instrument that measures combustion air flow and caused a low air flow reading. The boiler's automated control system increased the air rate to the unit and the flame pattern was redirected away from the flame scanner and the boiler tripped offline. One of two flame scanners was discovered to be dislodged from the support and had become inoperable; no alarm indication occurred to notify personnel of the situation prior to the trip. Subsequently, Boiler 401-C (EQT 0080) tripped and could not be restarted immediately and Boiler 401-D (EQT 0081) was out of service for maintenance work reducing excess boiler capacity. Corrective actions identified to prevent recurrence of the incident included, but were not limited to, the following: 1) enabled the alarms on B-401E flame scanners; 2) added

pilot tubes to routine preventative maintenance schedule; and 3) designed and installed a protective shroud over the air intake vent to prevent moisture or rain from entering the air intake. The Respondent determined the incident was “reasonably preventable”. The unauthorized discharge resulted in the following exceedances:

Source	Pollutants	SO ₂ Concentration (ppmv)	Permitted Limit (max lb/hr)	Excess Emissions
Flare No.1 (EQT 0013)	SO ₂	NA	50.00	5.253.6
Flare No.1 (EQT 0013)	VOC	NA	28.5	108.7
Boiler 401-E (EQT 0029)	NO _x	NA	16.80	76.0
Thermal Oxidizer, 3700 TOX (EQT 0195)	SO ₂	10,563.5 (2 hr avg.)	115.31	1.255
Thermal Oxidizer, 1600 TOX (EQT 0241)	SO ₂	732	115.31	24
Flare No. 4 (EQT 0360)	SO ₂	NA	25	84.0
Flare No. 4 (EQT 0360)	VOC	NA	4.74	78.4

- A. The incident is a violation of LAC 33:III.905.A and La. R.S. 30:2057(A)(2).
- B. Each exceedance of the 250 ppmv SO₂ concentration standard is a violation of 40 CFR 60.102a(f)(1)(i), Specific Requirement 847 of Title V Permit No. 2520-00027-V14, LAC 33:III.501.C.4, and La. R.S. 30:2057(A)(2).
- C. Each failure to comply with permitted emission limits is a violation of Title V Permit No. 2520-00027-V14, LAC 33:III.501.C.4, and La. R.S. 30:2057(A)(1) and 30:2057(A)(2).
- D. During the incident, Flare No.1 (EQT 0013) exceeded five (5) minutes of visible emissions during two consecutive hours. Each visible emissions exceedance is a violation of 40 CFR 60.18(c)(1), Specific Requirement 87 of Title V Permit No. 2520-00027-V14, LAC 33:III.501.C.4, and La. R.S. 30:2057(A)(2).
- E. During the incident, Flare No. 1 (EQT 0013) exceeded the 20% opacity standard for more than one six (6) minute period in sixty consecutive minutes. Each opacity exceedance is a violation of Specific Requirement 839 of Title V Permit No. 2520-00027-V4, LAC 33:III1311.C, and La. R.S. 30:2057(A)(2).

V.

The Department received an Unauthorized Discharge Notification Report for Incident No. T167063 dated November 6, 2015, and a Follow-up Unauthorized Discharge Notification Report dated December 30, 2015. According to the reports, on October 31, 2015, the 3700 Sulfur Recovery Unit

(SRU) Tail Gas Treater Unit tripped offline due to low boiler feed water in the Waste Heat Exchanger. A malfunctioning boiler feed water regulator caused the water level in the Waste Heat Exchanger to slowly drop during the shift. The alarm sounded due to the decreasing water level. The board operator acknowledged the alarm without recognizing the level drop. The low water level caused the trip and resulted in excess emissions of SO₂. The Respondent determined the incident was preventable. The duration of the unauthorized discharge was approximately 2.5 hours and resulted in the following exceedances:

Source	Pollutants	SO ₂ Concentration (ppmv)	SO ₂ Permitted Limit (max lb/hr)	Amount Reported Over Permit Limit (in lbs)
Thermal Oxidizer, 3700 TOX (EQT 0195)	SO ₂	6.492 (3 hr. avg)	115.31	2,264.2
Thermal Oxidizer, 30 TOX (EQT 0196)	SO ₂	1,294	115.31	174.6

- A. Each failure to use and/or diligently maintain the control device in proper working order is a violation of LAC 33:III.905.A and La. R.S. 30:2057(A)(2).
- B. Each exceedance of the 250 ppmv SO₂ concentration limit is a violation of 40 CFR 60.102a(f)(1)(i), Specific Requirement 847 of Title V Permit No. 2520-00027-V14, LAC 33:III.501.C.4, and La. R.S. 30:2057(A)(2).
- C. Each failure to comply with permitted emission limits is a violation of Title V Permit No. 2520-00027-V14, LAC 33:III.501.C.4, and La. R.S. 30:2057(A)(1) and 30:2057(A)(2).

VI.

The Department received an Unauthorized Discharge Notification Report for Incident No. T170613 dated May 24, 2016, and a Follow-up Unauthorized Discharge Notification Report dated July 15, 2016. According to the reports, on May 17, 2016, there were elevated SO₂ emissions from the 1600 Sulfur Recovery Unit (SRU) Thermal Oxidizer (TOX) due to loss of sulfur flow from the sulfur accumulator to the sulfur pit. The loss of flow was caused by a lower temperature in the pipe, which allowed molten sulfur to solidify. The sulfur solidified in the pipe as a result of a condensate return line leak upstream of a section of steam jacketed pipe that was not insulated. The Respondent determined the incident was preventable. The duration of the unauthorized discharge was approximately 2.5 hours and resulted in the following exceedances:

Thermal Oxidizer, 1600 TOX (EQT 0241)			
Date and Time	SO ₂ Concentration (ppmv)	SO ₂ Permitted Limit (max lb/hr)	Excess SO ₂ (in lbs)
05/17/2016 13:00	846	115.31	23.3
05/17/2016 14:00	7,806	115.31	842.1

Thermal Oxidizer, 1600 TOX (EQT 0241)			
Date and Time	SO ₂ Concentration (ppmv)	SO ₂ Permitted Limit (max lb/hr)	Excess SO ₂ (in lbs)
05/17/2016 15:00	8,588	115.31	868.5

- A. The incident is a violation of LAC 33:III.905.A and La. R.S. 30:2057(A)(2).
- B. Each exceedance of the 250 ppmv SO₂ concentration limit is a violation of 40 CFR 60.102a(f)(1)(i), Specific Requirement 847 of Title V Permit No. 2520-00027-V14, LAC 33:III.501.C.4, and La. R.S. 30:2057(A)(2).
- C. Each failure to comply with permitted emission limits is a violation of Title V Permit No. 2520-00027-V14, LAC 33:III.501.C.4, and La. R.S. 30:2057(A)(1) and 30:2057(A)(2).

VII.

The Department received an Unauthorized Discharge Notification Report for Incident No. T176314 dated March 14, 2017, and Follow-up Unauthorized Discharge Notification Reports dated May 5, 2017, and June 30, 2017. According to the reports, on March 7, 2017, a diesel leak from a sight flow indicator occurred in the Hydrotreater/Hydrocracker (HTHC) Unit. The process unit was shutdown to isolate the leak. The valve downstream of the sight flow indicator was locked out; however, the upstream valve remained in process service, which caused the pressure on the sight flow indicator to increase. The increase caused the indicator to malfunction. Pressure in the process unit was routed to the flare. Corrective actions identified to prevent recurrence of the incident included, but were not limited to, the following: 1) evaluation of the options to correctly isolate and/or remove the sight flow indicators; 2) examination of the yellow tag process; and 3) re-train personnel directly involved in the Lock Out Tag Out process per Safety and Health Guidelines 4.4 Section 6.0. The Respondent determined the incident was preventable. The duration of the unauthorized release was approximately 33 hours and resulted in the following emission exceedances:

Flare No. 4 (EQT 0360)				
	NO _x 12.6 max lb/hr	PM _{10/2.5} 0.33 max lb/hr	SO ₂ 25.00 max lb/hr	H ₂ S 0.53 max lb/hr
03/07/2017	41.1	3.45	2,307.5	12.0
03/07/2017	0.0	0.02	158.2	0.5
03/07/2017	0.0	0.0	5.4	0.0
03/07/2017	0.0	0.0	23.1	0.0
03/08/2017	0.0	0.0	184.4	0.6

Flare No. 4 (EQT 0360)				
	NO _x 12.6 max lb/hr	PM _{10/2.5} 0.35 max lb/hr	SO ₂ 25.00 max lb/hr	H ₂ S 0.53 max lb/hr
03/08/2017	0.0	0.0	179.3	0.6
03/08/2017	0.0	0.12	274.3	1.1
03/08/2017	0.0	0.17	270.2	1.1
03/08/2017	0.0	0.17	233.8	0.9
03/08/2017	0.0	0.02	136.3	0.3
03/08/2017	0.0	0.0	18.3	0.0
03/08/2017	0.0	0.0	42.4	0.0
03/08/2017	0.0	0.0	9.8	0.0
TOTAL EXCESS EMISSIONS	41.1 lbs	3.95 lbs	3,843.4 lbs	17.1 lbs

- A. The incident is a violation of LAC 33:III.905.A and La. R.S. 30:2057(A)(2).
- B. Each failure to comply with permitted emission limits is a violation of Title V Permit No. 2520-00027-V15, LAC 33:III.501.C.4, and La. R.S. 30:2057(A)(1) and 30:2057(A)(2).

VIII.

The Department received an Unauthorized Discharge Notification Report for Incident No. T177561 dated May 15, 2017, and Follow-up Unauthorized Discharge Notification Reports dated July 7, 2017, and August 16, 2017. According to the reports, on May 8, 2017, a small fire occurred in the Distillate Hydrotreating Unit (DHT) when diesel fuel drained from a line and contacted hot equipment while workers were disconnecting pipe flanges to perform maintenance work on a pressure safety valve (PSV). The PSV was isolated and the line was depressured prior to beginning the maintenance work. Workers failed to use secondary containment to collect material while separating the line. Corrective actions identified to prevent recurrence of the incident included, but were not limited to, the following: 1) installation of low point drain on the system; 2) additional training; 3) revision and training for Safety and Health Guideline (SHG) 4.18-Line Entry to ensure containment is used for line breaks; and 4) revision and training for Standard Maintenance Procedure (SMP) GN-025 to ensure containment is used for all line breaks. The Respondent reported the incident as preventable. The duration of the unauthorized release was approximately 11 minutes and resulted in the following emissions: 1.3 lbs of CO, 4.4 lbs of NO_x, 0.1 lbs of PM, and 0.001 lbs of SO₂ and H₂S. This is a violation of LAC 33:III.905.A and La. R.S. 30:2057(A)(2).

IX.

The Respondent reported the following unauthorized release:

REPORT (date)	PERMIT NUMBER	EMISSION POINT	INCIDENT DATE	POLLUTANTS RELEASED	QUANTITY REPORTED (lbs)	REPORTED CAUSE	REGULATORY or PERMIT REQUIREMENTS
Unauthorized Discharge Notification Report, T155480 (04/29/2014)	2520-00027-V13	EQT 0013 Flare No. 1	04/23/2014 - 04/24/2014 (2.88 hours)	CO	24.9	Flaring associated with a Coker Wet Gas Compressor (WGC) malfunction during a planned shutdown. A valve needed in order to decrease compressor loading closed too quickly, which caused the WGC to trip offline. The incident was reported as preventable.	LAC 33:III.905.A
Unauthorized Discharge Notification Report-60 Day Follow-up, T155480 (06/20/2014)		EQT 0007 Flare No. 3		NO _x	4.6		
1 st 2014 Semiannual Monitoring and Deviation Report (09/30/2014)		EQT 0360 Flare No. 4		PM	0.4		
				VOC	134.9		
				SO ₂	6,868.5		
				H ₂ S	36.9		

Each unauthorized release of emissions is a violation of any applicable permit and associated requirement(s) listed above, La. R.S. 30:2057(A)(1), and 30:2057(A)(2).

X.

The Respondent reported the following violations from permitted operating parameters:

	REPORT (date)	PERMIT NUMBER	EMISSION POINT/UNIT	INCIDENT DATE (Duration)	OPERATING PARAMETER	REPORTED CAUSE	REGULATORY or PERMIT REQUIREMENTS
A.	2 nd 2013 Semiannual Monitoring and Deviation Report (03/31/2014)	2520-00027-V12	EQT 0350 MVR Combustion Unit 1	09/3/2013 (1 hour)	Opacity ≤ 20% for six (6) minutes per consecutive 60 minute period	Smoking occurred at the Marine Vapor Recovery Unit on the dock	LAC 33:III.1311.C. Specific Requirement 975
B.	2 nd 2013 Semiannual Monitoring and Deviation Report (03/31/2014)	2520-00027-V12	EQT 0250 Coker No. 1 Steam Vent	10/13/2013 (1 instance)	Coker Drum pressure <5 psig	When depressuring Coke Drum A to the Flare Gas Recovery System, the vent on the coke drum was open to the atmosphere	40 CFR 60.103a(i). Specific Requirement 442

	REPORT (date)	PERMIT NUMBER	EMISSION POINT/UNIT	INCIDENT DATE (Duration)	OPERATING PARAMETER	REPORTED CAUSE	REGULATORY or PERMIT REQUIREMENTS
C.	2 nd 2013 Semiannual Monitoring and Deviation Report (03/31/2014)	2520-00027-V12	EQT 0350 MVR Combustion Unit 1	12/13/2013 (5 hours)	Opacity ≤ 20% for six (6) minutes per consecutive 60 minute period	While offloading a barge, smoke was observed from the Marine Vapor Recovery Unit located on the dock	LAC 33:III.1311.C. Specific Requirement 975
D.	1 st 2014 Semiannual Monitoring and Deviation Report (09/30/2014)	2520-00027-V12	EQT 0312 Refinery Fuel Gas System	01/08/2014 (5 hours)	H ₂ S ≤ 0.1 gr/dscf, 3 hr rolling average	High H ₂ S in the fuel gas	40 CFR 60.104(a)(1). Specific Requirement 449
E.	1 st 2014 Semiannual Monitoring and Deviation Report (09/30/2014)	2520-00027-V12	EQT 0350 MVR Combustion Unit 1	01/21/2014 (2 hours)	Opacity ≤ 20% for six (6) minutes per consecutive 60 minute period	While loading a ship, smoke was observed from the Marine Vapor Recovery Unit located on the dock	LAC 33:III.1311.C. Specific Requirement 975
F.	Unauthorized Discharge Notification Report, T155480 (04/29/2014)	2520-00027-V13	EQT 0312 J Fuel Gas System (West Plant Fuel Gas)	04/24/2014 (0:00-02:00)	Fuel gas: H ₂ S ≤ 0.1 gr/dscf (230 mg/dscm) [162 ppm]	H ₂ S = 234.73 ppm. Flaring associated with a Coker Wet Gas Compressor malfunction during a planned shutdown. A valve needed in order to decrease compressor loading closed too quickly, which caused the WGC to trip offline. The incident was reported as preventable.	40 CFR 60.104(a)(1). Specific Requirement 422
	Unauthorized Discharge Notification Report-60 Day Follow-up, T155480 (06/20/2014)						
	1 st 2014 Semiannual Monitoring and Deviation Report (09/30/2014)						

	REPORT (date)	PERMIT NUMBER	EMISSION POINT/UNIT	INCIDENT DATE (Duration)	OPERATING PARAMETER	REPORTED CAUSE	REGULATORY or PERMIT REQUIREMENTS
G.	Unauthorized Discharge Notification Report, T155480 (04/29/2014)	2520-00027-V13	EQT 0312 J Fuel Gas System (CCR Fuel Gas)	04/24/2014 (0:00-02:00)	Fuel gas: H ₂ S ≤ 0.1 gr/dscf (230 mg/dscm) [162 ppm]	H ₂ S = 179.83 ppm. Flaring associated with a Coker Wet Gas Compressor malfunction during a planned shutdown. A valve needed in order to decrease compressor loading closed too quickly, which caused the WGC to trip offline. The incident was reported as preventable.	40 CFR 60.104(a)(1). Specific Requirement 422
	Unauthorized Discharge Notification Report-60 Day Follow-up, T155480 (06/20/2014)						
	1 st 2014 Semiannual Monitoring and Deviation Report (09/30/2014)						
H.	1 st 2014 Semiannual CEMS Report (07/30/2014)	2520-00027-V12	EQT 0312 Refinery Fuel Gas System	01/15/2014 (5 hours)	Fuel gas: H ₂ S ≤ 0.1 gr/dscf (230 mg/dscm) [162 ppm]	Fuel gas H ₂ S was elevated due to an unknown cause	40 CFR 60.104(a)(1). Specific Requirement 449
	1 st 2014 Semiannual Monitoring and Deviation Report (09/30/2014)						
I.	1 st 2014 Semiannual CEMS Report (07/30/2014)	2520-00027-V12	EQT 0312 Refinery Fuel Gas System	02/09/2014-02/10/2014 (4 hours)	Fuel gas: H ₂ S ≤ 0.1 gr/dscf (230 mg/dscm) [162 ppm]	The lean amine return pump tripped offline due to high temperature, which led to flooding of the regenerator column and subsequent downstream amine acid gas knockout vessels.	40 CFR 60.104(a)(1). Specific Requirement 449
	1 st 2014 Semiannual Monitoring and Deviation Report (09/30/2014)						

	REPORT (date)	PERMIT NUMBER	EMISSION POINT/UNIT	INCIDENT DATE (Duration)	OPERATING PARAMETER	REPORTED CAUSE	REGULATORY or PERMIT REQUIREMENTS
J.	1 st 2014 Semiannual Monitoring and Deviation Report (09/30/2014)	2520-00027- V13	EQT 0196 Thermal Oxidizer, 30 TOX	06/09/2014 (3 hours)	SO ₂ ≤ 250 ppmv (0% O ₂ , 12 hr rolling average)	Increased feed rate to 30 SRU due to 1600 SRU and 3700 SRU malfunctions caused elevated SO ₂ emissions: 266.5 ppm	40 CFR 60.102a(f)(1)(i). Specific Requirement 883
K.	1 st 2014 Semiannual Monitoring and Deviation Report (09/30/2014)	2520-00027- V13	GRP 0607 SRU/ TOX Emissions Cap	06/11/2014 (1 hour)	Opacity ≤ 20% for six (6) minutes per consecutive 60 minute period	The 1600 TOX tripped on high stack temperature, smoking was observed.	LAC 33:III.1311.C. Specific Requirement 904
L.	1 st 2014 Semiannual Monitoring and Deviation Report (09/30/2014)	2520-00027- V13	GRP 0007 SRU/ TOX Emissions Cap	06/20/2014 (5 hours)	Opacity ≤ 20% for six (6) minutes per consecutive 60 minute period	While loading a ship, smoke was observed from the Marine Vapor Recovery Unit located on the dock. An electrical error caused the forced air fan to rotate in the wrong direction	LAC 33:III.1311.C. Specific Requirement 904
M.	2 nd 2014 Semiannual CEMS Report (01/30/2015)	2520-00027- V13	EQT 0441 Ja Fuel Gas System	09/22/2014 (2 hours)	H ₂ S ≤ 162 ppmv (3 hr rolling average)	Increased quantity of off- gas from the debutanizer being sent to the fuel gas following H ₂ S removal due to restrictions of 3 rd party pipeline	40 CFR 60.102a(g)(1)(ii). Specific Requirement 675
	2 nd 2014 Semiannual Monitoring and Deviation Report (03/31/2015)						
N.	2 nd 2014 Semiannual CEMS Report (01/30/2015)	2520-00027- V13	EQT 0312 J Fuel Gas System	09/22/2014 (2 hours)	Fuel gas: H ₂ S ≤ 0.1 gr/dscf (230 mg/dscm) [162 ppm]	Increased quantity of off- gas from the debutanizer being sent to the fuel gas following H ₂ S removal due to restrictions of 3 rd party pipeline	40 CFR 60.104(a)(1). Specific Requirement 422
	2 nd 2014 Semiannual Monitoring and Deviation Report (03/31/2015)						

	REPORT (date)	PERMIT NUMBER	EMISSION POINT/UNIT	INCIDENT DATE (Duration)	OPERATING PARAMETER	REPORTED CAUSE	REGULATORY or PERMIT REQUIREMENTS
O.	2 nd 2014 Semiannual MACT Report (02/27/2015)	2520-00027- V13	EQT 0013 Flare No. 1	07/22/2014 (15 minutes)	Opacity \leq 20% for six (6) minutes per consecutive 60 minute period	Intermittent smoking due to Alky Unit Compressor	LAC 33:III.1311.C. Specific Requirement 875
	2 nd 2014 Semiannual Monitoring and Deviation Report (03/31/2015)						
P.	2 nd 2015 Semiannual CEMS Report (01/29/2016)	2520-00027- V14	EQT 0013 Flare No. 1	12/17/2015 (3 hours)	Fuel gas: H ₂ S \leq 162 ppmv (3 hr rolling average) [162 ppm]	Unknown: Prior to the source being identified, the flaring ceased	40 CFR 60.103a(h), Specific Requirement 804
	2 nd 2015 Semiannual Monitoring and Deviation Report (03/31/2016)			12/17/2015- 12/18/2015 (3 hours)			
Q.	2 nd 2015 Semiannual CEMS Report (01/29/2016)	2520-00027- V14	EQT 0360 Flare No. 4	12/19/2015 (4 hours)	Fuel gas: H ₂ S \leq 162 ppmv (3 hr rolling average)	Unknown: Prior to the source being identified, the flaring ceased	40 CFR 60.103a(h), Specific Requirement 804
	2 nd 2015 Semiannual Monitoring and Deviation Report (03/31/2016)						
R.	2 nd 2015 Semiannual CEMS Report (01/29/2016)	2520-00027- V14	EQT 0013 Flare No. 1	12/21/2015 (2 hours)	Fuel gas: H ₂ S \leq 162 ppmv (3 hr rolling average)	Unknown: Prior to the source being identified, the flaring ceased	40 CFR 60.103a(h), Specific Requirement 804
	2 nd 2015 Semiannual Monitoring and Deviation Report (03/31/2016)						
S.	2 nd 2015 Semiannual CEMS Report (01/29/2016)	2520-00027- V14	EQT 0013 Flare No. 1	12/26/2015 (4 hours)	Fuel gas: H ₂ S \leq 162 ppmv (3 hr rolling average)	Unknown: Prior to the source being identified, the flaring ceased	40 CFR 60.103a(h), Specific Requirement 804
	2 nd 2015 Semiannual Monitoring and Deviation Report (03/31/2016)						

	REPORT (date)	PERMIT NUMBER	EMISSION POINT/UNIT	INCIDENT DATE (Duration)	OPERATING PARAMETER	REPORTED CAUSE	REGULATORY or PERMIT REQUIREMENTS
T.	2 nd 2015 Semiannual MACT Report (02/25/2016)	2520-00027-V14	EQT 0013 Flare No. 1	09/03/2015 (39 minutes)	Opacity ≤ 20% for six (6) minutes per consecutive 60 minute period	Intermittent smoking due to boiler loss	LAC 33:III.1311.C. Specific Requirement 839
U.	2 nd 2015 Semiannual Monitoring and Deviation Report (03/31/2016)	2520-00027-V14	GRP 0021 Marine Vapor Recovery Units	08/12/2015 (1 hr)	Opacity ≤ 20% for six (6) minutes per consecutive 60 minute period	Smoke was observed from the Marine Vapor Recovery Unit while loading a ship.	LAC 33:III.1311.C. Specific Requirement 923
V.	2 nd 2015 Semiannual Monitoring and Deviation Report (03/31/2016)	2520-00027-V14	EQT 0421 New Stationary Non-Emergency Diesel Engines	08/19/2015-12/31/2015 (135 days)	Be in compliance with the applicable emission limitations, operating limitations and other requirements in 40 CFR 63 Subpart ZZZZ at all times.	Seven (7) non-emergency stationary diesel engines were replaced with engines that were over 500 bhp. The outgoing engines were rated for 435 bhp and the incoming engines were at 535 peak bhp.	40 CFR 60.6605(a). Specific Requirement 591
W.	2015 Title V Annual Compliance Certification (03/31/2016)	2520-00027-V13/14	UNF 0001 Facility	01/01/2015-12/31/2015 (8,760 hours)	When air pollution control facilities have been installed on a property, diligently maintain them in proper working order whenever any emissions are being made which can be controlled by the facilities.	The drift eliminators installed on cooling towers CT-401 (EQT 0058) and CT-402 (EQT 0055) were degraded to a point that the effectiveness was considered lower than the design.	LAC 33:III.905. Specific Requirements 66 & 959
X.	2015 Title V Annual Compliance Certification (03/31/2016)	2520-00027-V13/14	UNF 0001 Facility	NA	Comply with the provisions in 40 CFR 68, except as specified in LAC 33:III.5901	Deficiencies were discovered in documentation for four (4) Management of Changes (MOCs)	LAC 33:III.5901.A. Specific Requirement 956

Each failure to operate according to permitted requirements is a violation of any applicable permit and associated requirement(s) listed above, LAC 33:III.501.C.4, La. R.S. 30:2057(A)(1), and 30:2057(A)(2).

XI.

The Respondent reported the following emission exceedances:

	REPORT (date)	PERMIT NUMBER	EMISSION POINT/UNIT	INCIDENT DATE (Duration)	POLLUTANTS RELEASED (Permit Limit)	QUANTITY REPORTED (in lbs)	REPORTED CAUSE	REGULATORY or PERMIT REQUIREMENTS
A.	2013 Title V Annual Compliance Certification (03/31/2014)	2520- 00027- V11/V12	EQT 0093 CCR Heater	03/21/2013 (3 hours)	SO ₂ (9.95 lb/hr)	Not Reported	High H ₂ S in the fuel gas due to the 3700 SRU tail gas stripper.	Emission Rates for Criteria Pollutants
B.	2 nd 2013 Semiannual CEMS Report (01/30/2014)	2520- 00027-V12	EQT 0241 Thermal Oxidizer, 1600 TOX (1600 SRU)	07/23/2013 (1 hour)	SO ₂ (115.31 lb/hr)	Not reported	An abrupt increase in sour water stripper acid gas and amine gas resulted in excess emissions from the TOX	Emission Rates for Criteria Pollutants
	2 nd 2013 Semiannual Monitoring and Deviation Report (03/31/2014)							
C.	2 nd 2013 Semiannual CEMS Report (01/30/2014)	2520- 00027-V12	EQT 0196 Thermal Oxidizer, 30 TOX (30 SRU)	07/27/2013 (1 hour)	SO ₂ (115.31 lb/hr)	Not reported	Sulfur loading to the 30 SRU increased abruptly when the sour water feed was swapped from T-04- 32 to T-100-2. The increase in sulfur loading caused the 30 SRU to go off ratio resulting in excess emissions	Emission Rates for Criteria Pollutants
	2 nd 2013 Semiannual Monitoring and Deviation Report (03/31/2014)							
D.	2 nd 2013 Semiannual CEMS Report (01/30/2014)	2520- 00027-V12	EQT 0196 Thermal Oxidizer, 30 TOX (30 SRU)	08/23/2013 (1 hour)	SO ₂ (115.31 lb/hr)	Not reported	An increase in sulfur loading to the 30 SRU resulted from a higher than expected sulfur content in the crude feedstock.	Emission Rates for Criteria Pollutants
	2 nd 2013 Semiannual Monitoring and Deviation Report (03/31/2014)							

	REPORT (date)	PERMIT NUMBER	EMISSION POINT/UNIT	INCIDENT DATE (Duration)	POLLUTANTS RELEASED (Permit Limit)	QUANTITY REPORTED (in lbs)	REPORTED CAUSE	REGULATORY or PERMIT REQUIREMENTS
E.	2 nd 2013 Semiannual CEMS Report (01/30/2014)	2520-00027-V12	EQT 0196 Thermal Oxidizer, 30 TOX (30 SRU)	09/20/2013 (1 hour)	SO ₂ (115.31 lb/hr)	Not reported	A loss of signal for the flow indicator controller on the oxygen feed system to the 30 SRU led to a loss of oxygen to the 30 SRU reaction furnace.	Emission Rates for Criteria Pollutants
	2 nd 2013 Semiannual Monitoring and Deviation Report (03/31/2014)							
F.	2 nd 2013 Semiannual CEMS Report (01/30/2014)	2520-00027-V12	EQT 0196 Thermal Oxidizer, 30 TOX (30 SRU)	09/20/2013 (1 hour)	SO ₂ (115.31 lb/hr)	Not reported	A lost signal from a temperature indicator led to a loss of oxygen feed to the 30 SRU.	Emission Rates for Criteria Pollutants
	2 nd 2013 Semiannual Monitoring and Deviation Report (03/31/2014)							
G.	2 nd 2013 Semiannual CEMS Report (01/30/2014)	2520-00027-V12	EQT 0423 Refinery Startup/Shutdown to Flares	07/12/2013 (1 hour)	SO ₂ (429.9 lb/hr)	Not reported	During the Hydrocracker Unit (HCU) startup, LPG was diverted to the flares and flare gas recovery unit. Unrecovered gas was combusted at the flares.	Emission Rates for Criteria Pollutants. Emissions Rates for TAP/HAP and other Pollutants
	2 nd 2013 Semiannual Monitoring and Deviation Report (03/31/2014)			07/12/2013 (2 hours)	VOC (350 lb/hr)	Not reported		
	07/12/2013 (5 hours)			H ₂ S (2.12 lb/hr)	Not reported			
H.	2 nd 2013 Semiannual CEMS Report (01/30/2014)	2520-00027-V12	EQT 0013 Flare No. 1	08/21/2013 (1 hour)	SO ₂ (50.0 lb/hr)	Not reported	Unknown: Prior to the source being identified, the flaring ceased	Emission Rates for Criteria Pollutants
	2 nd 2013 Semiannual Monitoring and Deviation Report (03/31/2014)							

	REPORT (date)	PERMIT NUMBER	EMISSION POINT/UNIT	INCIDENT DATE (Duration)	POLLUTANTS RELEASED (Permit Limit)	QUANTITY REPORTED (in lbs)	REPORTED CAUSE	REGULATORY or PERMIT REQUIREMENTS
I.	2 nd 2013 Semiannual CEMS Report (01/30/2014)	2520- 00027-V12	EQT 0360 Flare No. 4	08/21/2013 (1 hour)	VOC (350 lb/hr)	Not reported	Unknown: Prior to the source being identified, the flaring ceased	Emission Rates for Criteria Pollutants
	2 nd 2013 Semiannual Monitoring and Deviation Report (03/31/2014)							
J.	2 nd 2013 Semiannual CEMS Report (01/30/2014)	2520- 00027-V12	EQT 0360 Flare No. 4	08/21/2013 (12 hours)	VOC (4.74 lb/hr)	Not reported	Unknown: Prior to the source being identified, the flaring ceased	Emission Rates for Criteria Pollutants
	CO (28.05 lb/hr)				Not reported			
	2 nd 2013 Semiannual Monitoring and Deviation Report (03/31/2014)				SO ₂ (25 lb/hr)	Not reported		
	PM _{10/2.5} (0.17 lb/hr)				Not reported			
K.	2 nd 2013 Semiannual CEMS Report (01/30/2014)	2520- 00027-V12	EQT 0360 Flare No. 4	08/21/2013 (2 hours)	NO _x (12.95 lb/hr)	Not reported	Unknown: Prior to the source being identified, the flaring ceased	Emission Rates for Criteria Pollutants, Emissions Rates for TAP/HAP and other Pollutants
	2 nd 2013 Semiannual Monitoring and Deviation Report (03/31/2014)				H ₂ S (0.50 lb/hr)	Not reported		
L.	2 nd 2013 Semiannual CEMS Report (01/30/2014)	2520- 00027-V12	EQT 0360 Flare No. 4	09/08/2013 (1 hour)	PM _{10/2.5} (0.17 lb/hr)	Not reported	Unknown: Prior to the source being identified, the flaring ceased	Emission Rates for Criteria Pollutants
	2 nd 2013 Semiannual Monitoring and Deviation Report (03/31/2014)							

	REPORT (date)	PERMIT NUMBER	EMISSION POINT/UNIT	INCIDENT DATE (Duration)	POLLUTANTS RELEASED (Permit Limit)	QUANTITY REPORTED (in lbs)	REPORTED CAUSE	REGULATORY or PERMIT REQUIREMENTS
M.	2 nd 2013 Semiannual CEMS Report (01/30/2014)	2520- 00027-V12	EQT 0360 Flare No. 4	09/08/2013 (3 hours)	VOC (4.74 lb/hr)	Not reported	Unknown; Prior to the source being identified, the flaring ceased	Emission Rates for Criteria Pollutants
	2 nd 2013 Semiannual Monitoring and Deviation Report (03/31/2014)							
N.	2 nd 2013 Semiannual CEMS Report (01/30/2014)	2520- 00027-V12	EQT 0360 Flare No. 4	10/23/2013 (1 hour)	VOC (4.74 lb/hr)	Not reported	Unknown; Prior to the source being identified, the flaring ceased	Emission Rates for Criteria Pollutants
	2 nd 2013 Semiannual Monitoring and Deviation Report (03/31/2014)							
O.	2 nd 2013 Semiannual CEMS Report (01/30/2014)	2520- 00027-V12	EQT 0013 Flare No. 1	10/26/2013 (2 hours)	VOC (28.5 lb/hr)	Not reported	Unknown; Prior to the source being identified, the flaring ceased	Emission Rates for Criteria Pollutants
	2 nd 2013 Semiannual Monitoring and Deviation Report (03/31/2014)							
P.	2 nd 2013 Semiannual CEMS Report (01/30/2014)	2520- 00027-V12	EQT 0360 Flare No. 4	10/26/13 (3 hours)	CO (28.05 lb/hr)	Not reported	Unknown; Prior to the source being identified, the flaring ceased	Emission Rates for Criteria Pollutants
	2 nd 2013 Semiannual Monitoring and Deviation Report (03/31/2014)				SO ₂ (25 lb/hr)	Not reported		
					PM _{10/2.5} (0.17 lb/hr)	Not reported		

	REPORT (date)	PERMIT NUMBER	EMISSION POINT/UNIT	INCIDENT DATE (Duration)	POLLUTANTS RELEASED (Permit Limit)	QUANTITY REPORTED (in lbs)	REPORTED CAUSE	REGULATORY or PERMIT REQUIREMENTS
Q.	2 nd 2013 Semiannual CEMS Report (01/30/2014)	2520-00027-V12	EQT 0360 Flare No. 4	10/26/2013 (2 hours)	VOC (4.74 lb/hr)	Not reported	Unknown; Prior to the source being identified, the flaring ceased	Emission Rates for Criteria Pollutants
	2 nd 2013 Semiannual Monitoring and Deviation Report (03/31/2014)							
R.	2 nd 2013 Semiannual CEMS Report (01/30/2014)	2520-00027-V12	EQT 0360 Flare No. 4	10/27/2013 (6 hours)	NO _x (12.95 lb/hr)	Not reported	Unknown; Prior to the source being identified, the flaring ceased	Emission Rates for Criteria Pollutants. Emissions Rates for TAP/HAP and other Pollutants
	H ₂ S (0.50 lb/hr)							
	VOC (4.74 lb/hr)							
	CO (28.05 lb/hr)							
	SO ₂ (25 lb/hr)							
PM _{10/2.5} (0.17 lb/hr)								
S.	2 nd 2013 Semiannual CEMS Report (01/30/2014)	2520-00027-V12	EQT 0013 Flare No. 1	11/21/2013 (1 hour)	VOC (28.5 lb/hr)	Not reported	The Flare Gas Recovery Unit (FGRU) shutdown due to high level in the service water liquid separator drum. The shutdown of the FGRU resulted in flaring.	Emission Rates for Criteria Pollutants
	2 nd 2013 Semiannual Monitoring and Deviation Report (03/31/2014)							
T.	2 nd 2013 Semiannual CEMS Report (01/30/2014)	2520-00027-V12	EQT 0034 Flare No. 3	11/21/2013 (1 hour)	VOC (4.74 lb/hr)	Not reported	The Flare Gas Recovery Unit (FGRU) shutdown due to high level in the service water liquid separator drum. The shutdown of the FGRU resulted in flaring.	Emission Rates for Criteria Pollutants
	2 nd 2013 Semiannual Monitoring and Deviation Report (03/31/2014)							

	REPORT (date)	PERMIT NUMBER	EMISSION POINT/UNIT	INCIDENT DATE (Duration)	POLLUTANTS RELEASED (Permit Limit)	QUANTITY REPORTED (in lbs)	REPORTED CAUSE	REGULATORY or PERMIT REQUIREMENTS
U.	2 nd 2013 Semiannual CEMS Report (01/30/2014)	2520-00027-V12	EQT 0360 Flare No. 4	11/21/2013 (1 hour)	VOC (4.74 lb/hr)	Not reported	The Flare Gas Recovery Unit (FGRU) shutdown due to high level in the service water liquid separator drum. The shutdown of the FGRU resulted in flaring.	Emission Rates for Criteria Pollutants
	2 nd 2013 Semiannual Monitoring and Deviation Report (03/31/2014)							
V.	2 nd 2013 Semiannual CEMS Report (01/30/2014)	2520-00027-V12	EQT 0360 Flare No. 4	12/06/2013 (2 hours)	VOC (4.74 lb/hr)	Not reported	Unknown: Prior to the source being identified, the flaring ceased	Emission Rates for Criteria Pollutants
	2 nd 2013 Semiannual Monitoring and Deviation Report (03/31/2014)							
W.	2 nd 2013 Semiannual Monitoring and Deviation Report (03/31/2014)	2520-00027-V12	EQT 0360 Flare No. 4	09/03/2013 (1 – 3 hours)	VOC (4.74 lb/hr)	Not reported	This deviation was reported in the 2 nd Half 2013 CEMS report submitted 1/30/2013. However, the dates were inadvertently incorrect. This submission contains the correct date	Emission Rates for Criteria Pollutants. Emissions Rates for TAP/HAP and other Pollutants
					CO (28.05 lb/hr)	Not reported		
					SO ₂ (25.0 lb/hr)	Not reported		
					PM10 (0.17 lb/hr)	Not reported		
					NO _x (12.95 lb/hr)	Not reported		
					H ₂ S (0.50 lb/hr)	Not reported		
X.	2 nd 2013 Semiannual Monitoring and Deviation Report (03/31/2014)	2520-00027-V12	EQT 0013 Flare No. 1	10/16/2013 (1 hour)	VOC (28.5 lb/hr)	Not reported	The cause of flaring has not been determined.	Emission Rates for Criteria Pollutants
					SO ₂ (50.0 lb/hr)	Not reported		
Y.	2 nd 2013 Semiannual Monitoring and Deviation Report (03/31/2014)	2520-00027-V12	EQT 0013 Flare No. 1	10/17/2013 (2 – 3 hours)	VOC (28.5 lb/hr)	Not reported	The cause of flaring has not been determined.	Emission Rates for Criteria Pollutants
					SO ₂ (50.0 lb/hr)	Not reported		

	REPORT (date)	PERMIT NUMBER	EMISSION POINT/UNIT	INCIDENT DATE (Duration)	POLLUTANTS RELEASED (Permit Limit)	QUANTITY REPORTED (in lbs)	REPORTED CAUSE	REGULATORY or PERMIT REQUIREMENTS
Z.	2 nd 2013 Semiannual Monitoring and Deviation Report (03/31/2014)	2520- 00027-V12	EQT 0013 Flare No. 1	12/06/2013 (2 hours)	VOC (28.5 lb/hr)	Not reported	The cause of flaring has not been determined. The deviation was inadvertently reported as Flare 4 in the 2 nd Half 2013 CEMS report submitted on 1/30/2013	Emission Rates for Criteria Pollutants
A2.	1 st 2014 Semiannual CEMS Report (07/30/2014)	2520- 00027-V12	EQT 0013 Flare No. 1	01/18/2014 (4 hours)	VOC (28.5 lb/hr)	Not reported	Source (cause) unknown	Emission Rates for Criteria Pollutants
	1 st 2014 Semiannual Monitoring and Deviation Report (09/30/2014)				SO ₂ (50.0 lb/hr)	Not reported		
B2.	1 st 2014 Semiannual CEMS Report (07/30/2014)	2520- 00027-V12	EQT 0013 Flare No. 1	02/05/2014 (6 hours)	VOC (28.5 lb/hr)	Not reported	Source (cause) unknown	Emission Rates for Criteria Pollutants
	1 st 2014 Semiannual Monitoring and Deviation Report (09/30/2014)			02/05/2014 (1 hour)	SO ₂ (50.0 lb/hr)	Not reported		
C2.	1 st 2014 Semiannual CEMS Report (07/30/2014)	2520- 00027-V12	EQT 0013 Flare No. 1	02/06/2014- 02/09/2014 (66 hours)	VOC (28.5 lb/hr)	Not reported	Source (cause) unknown	Emission Rates for Criteria Pollutants
	1 st 2014 Semiannual Monitoring and Deviation Report (09/30/2014)							
D2.	1 st 2014 Semiannual CEMS Report (07/30/2014)	2520- 00027-V12	EQT 0007 Flare No. 2	02/07/2014- 02/08/2014 (7 hours)	VOC (28.5 lb/hr)	Not reported	Source (cause) unknown	Emission Rates for Criteria Pollutants
	1 st 2014 Semiannual Monitoring and Deviation Report (09/30/2014)							

	REPORT (date)	PERMIT NUMBER	EMISSION POINT/UNIT	INCIDENT DATE (Duration)	POLLUTANTS RELEASED (Permit Limit)	QUANTITY REPORTED (in lbs)	REPORTED CAUSE	REGULATORY or PERMIT REQUIREMENTS
E3.	1 st 2014 Semiannual CEMS Report (07/30/2014)	2520- 00027-V12	EQT 0007 Flare No. 2	02/11/2014 (1 hour)	VOC (28.5 lb/hr)	Not reported	Source (cause) unknown	Emission Rates for Criteria Pollutants
	1 st 2014 Semiannual Monitoring and Deviation Report (09/30/2014)							
F2.	1 st 2014 Semiannual CEMS Report (07/30/2014)	2520- 00027-V12	EQT 0007 Flare No. 2	02/12/2014 (7 hours)	VOC (28.5 lb/hr)	Not reported	Source (cause) unknown	Emission Rates for Criteria Pollutants
	1 st 2014 Semiannual Monitoring and Deviation Report (09/30/2014)							
G2.	1 st 2014 Semiannual CEMS Report (07/30/2014)	2520- 00027-V12	EQT 0034 Flare No. 3	02/13/2014 (2 hours)	VOC (4.74 lb/hr)	Not reported	Source (cause) unknown	Emission Rates for Criteria Pollutants
	1 st 2014 Semiannual Monitoring and Deviation Report (09/30/2014)							
H2.	1 st 2014 Semiannual CEMS Report (07/30/2014)	2520- 00027-V12	EQT 0034 Flare No. 3	02/14/2014 (1 hour)	VOC (4.74 lb/hr)	Not reported	Source (cause) unknown	Emission Rates for Criteria Pollutants
	1 st 2014 Semiannual Monitoring and Deviation Report (09/30/2014)							

	REPORT (date)	PERMIT NUMBER	EMISSION POINT/UNIT	INCIDENT DATE (Duration)	POLLUTANTS RELEASED (Permit Limit)	QUANTITY REPORTED (in lbs)	REPORTED CAUSE	REGULATORY or PERMIT REQUIREMENTS
I2.	1 st 2014 Semiannual CEMS Report (07/30/2014)	2520- 00027-V12	EQT 0360 Flare No. 4	02/18/2014 (3 hours)	VOC (4.74 lb/hr)	Not reported	Source (cause) unknown	Emission Rates for Criteria Pollutants
	1 st 2014 Semiannual Monitoring and Deviation Report (09/30/2014)							
J2.	1 st 2014 Semiannual CEMS Report (07/30/2014)	2520- 00027-V12	EQT 0360 Flare No. 4	02/28/2014 (3 hours)	CO (28.05 lb/hr)	Not reported	Source (cause) unknown	Emission Rates for Criteria Pollutants
	SO ₂ (25 lb/hr)				Not reported			
	PM _{10/2.5} (0.17 lb/hr)				Not reported			
K2.	1 st 2014 Semiannual CEMS Report (07/30/2014)	2520- 00027-V13	EQT 0360 Flare No. 4	03/16/2014 (1 hour)	VOC (4.74 lb/hr)	Not reported	Source (cause) unknown	Emission Rates for Criteria Pollutants
	1 st 2014 Semiannual Monitoring and Deviation Report (09/30/2014)							
L2.	1 st 2014 Semiannual CEMS Report (07/30/2014)	2520- 00027-V13	EQT 0360 Flare No. 4	04/03/2014 (1 hour)	VOC (4.74 lb/hr)	Not reported	Source (cause) unknown	Emission Rates for Criteria Pollutants
	1 st 2014 Semiannual Monitoring and Deviation Report (09/30/2014)							
M2.	1 st 2014 Semiannual CEMS Report (07/30/2014)	2520- 00027-V13	EQT 0013 Flare No. 1	04/08/2014 (1 hour)	VOC (28.5 lb/hr)	Not reported	Source (cause) unknown	Emission Rates for Criteria Pollutants
	1 st 2014 Semiannual Monitoring and Deviation Report (09/30/2014)							

	REPORT (date)	PERMIT NUMBER	EMISSION POINT/UNIT	INCIDENT DATE (Duration)	POLLUTANTS RELEASED (Permit Limit)	QUANTITY REPORTED (in lbs)	REPORTED CAUSE	REGULATORY or PERMIT REQUIREMENTS
N2.	1 st 2014 Semiannual CEMS Report (07/30/2014)	2520-00027-V13	EQT 0013 Flare No. 1	04/22/2014 (1 hour)	VOC (28.5 lb/hr)	Not reported	Hydrocarbon vapors purged to the flare header as a vessel was filling up with nitrogen in the Alky unit. The vessel filled too fast and the flare gas recovery unit was not able to capture all the hydrocarbon vapors	Emission Rates for Criteria Pollutants
	1 st 2014 Semiannual Monitoring and Deviation Report (09/30/2014)							
O2.	1 st 2014 Semiannual CEMS Report (07/30/2014)	2520-00027-V12	EQT 0196 Thermal Oxidizer, 30 TOX (30 SRU)	01/28/2014 (1 hour)	SO ₂ (115.31 lb/hr)	Not reported	The steam turbine on the 30 SRU reaction furnace and sulfur accumulator pumps on the 30 sulfur pit tripped unexpectedly.	Emission Rates for Criteria Pollutants
	1 st 2014 Semiannual Monitoring and Deviation Report (09/30/2014)							
P2.	1 st 2014 Semiannual CEMS Report (07/30/2014)	2520-00027-V12	EQT 0196 Thermal Oxidizer, 30 TOX (30 SRU)	02/13/2014 (1 hour)	SO ₂ (115.31 lb/hr)	Not reported	The 30 SRU reaction furnace main air valve was stuck at a previous set point, and therefore unable to properly move to accommodate SRU feed rate.	Emission Rates for Criteria Pollutants
	1 st 2014 Semiannual Monitoring and Deviation Report (09/30/2014)							
Q2.	1 st 2014 Semiannual CEMS Report (07/30/2014)	2520-00027-V12	EQT 0196 Thermal Oxidizer, 30 TOX (30 SRU)	02/28/2014 (1 hour)	SO ₂ (115.31 lb/hr)	Not reported	The 30 SRU was upset when the feed rate was increased for the unit. Operators adjusted the unit to achieve normal operation.	Emission Rates for Criteria Pollutants
	1 st 2014 Semiannual Monitoring and Deviation Report (09/30/2014)							
R2.	1 st 2014 Semiannual CEMS Report (07/30/2014)	2520-00027-V12	EQT 0013 Flare No. 1	01/15/2014 (1 hour)	SO ₂ (6.36 lb/hr)	Not Reported	Fuel gas H ₂ S was elevated due to an unknown cause	Emission Rates for Criteria Pollutants
	1 st 2014 Semiannual Monitoring and Deviation Report (09/30/2014)							

	REPORT (date)	PERMIT NUMBER	EMISSION POINT/UNIT	INCIDENT DATE (Duration)	POLLUTANTS RELEASED (Permit Limit)	QUANTITY REPORTED (in lbs)	REPORTED CAUSE	REGULATORY or PERMIT REQUIREMENTS
S2.	1 st 2014 Semiannual CEMS Report (07/30/2014)	2520-00027-V12	EQT 0029 Boiler 401-E	01/15/2014 (5 hours)	SO ₂ (10.77 lb/hr)	Not Reported	Fuel gas H ₂ S was elevated due to an unknown cause	Emission Rates for Criteria Pollutants
	1 st 2014 Semiannual Monitoring and Deviation Report (09/30/2014)							
T2.	1 st 2014 Semiannual CEMS Report (07/30/2014)	2520-00027-V12	EQT 0080 Boiler B-401C	01/15/2014 (4 hours)	SO ₂ (9.08 lb/hr)	Not Reported	Fuel gas H ₂ S was elevated due to an unknown cause	Emission Rates for Criteria Pollutants
	1 st 2014 Semiannual Monitoring and Deviation Report (09/30/2014)							
U2.	1 st 2014 Semiannual CEMS Report (07/30/2014)	2520-00027-V12	EQT 0081 Boiler B-401D	01/15/2014 (4 hours)	SO ₂ (9.08 lb/hr)	Not Reported	Fuel gas H ₂ S was elevated due to an unknown cause	Emission Rates for Criteria Pollutants
	1 st 2014 Semiannual Monitoring and Deviation Report (09/30/2014)							
V2.	1 st 2014 Semiannual CEMS Report (07/30/2014)	2520-00027-V12	EQT 0212 HCU Fractionator Charge Heater	01/15/2014 (5 hours)	SO ₂ (10.54 lb/hr)	Not Reported	Fuel gas H ₂ S was elevated due to an unknown cause	Emission Rates for Criteria Pollutants
	1 st 2014 Semiannual Monitoring and Deviation Report (09/30/2014)							
W2.	1 st 2014 Semiannual CEMS Report (07/30/2014)	2520-00027-V12	EQT 0094 GDU Heater	01/15/2014 (5 hours)	SO ₂ (10.54 lb/hr)	Not Reported	Fuel gas H ₂ S was elevated due to an unknown cause	Emission Rates for Criteria Pollutants
	1 st 2014 Semiannual Monitoring and Deviation Report (09/30/2014)							

	REPORT (date)	PERMIT NUMBER	EMISSION POINT/UNIT	INCIDENT DATE (Duration)	POLLUTANTS RELEASED (Permit Limit)	QUANTITY REPORTED (in lbs)	REPORTED CAUSE	REGULATORY or PERMIT REQUIREMENTS
X2.	1 st 2014 Semiannual CEMS Report (07/30/2014)	2520- 00027-V12	GRP 0013 DHT Cap	01/15/2014 (3 hours)	SO ₂ (3.59 lb/hr)	Not Reported	Fuel gas H ₂ S was elevated due to an unknown cause	Emission Rates for Criteria Pollutants
	1 st 2014 Semiannual Monitoring and Deviation Report (09/30/2014)							
Y2.	1 st 2014 Semiannual CEMS Report (07/30/2014)	2520- 00027-V12	EQT 0060 DGT Stripper Reboiler	01/15/2014 (3 hours)	SO ₂ (2.77 lb/hr)	Not Reported	Fuel gas H ₂ S was elevated due to an unknown cause	Emission Rates for Criteria Pollutants
	1 st 2014 Semiannual Monitoring and Deviation Report (09/30/2014)							
Z2.	1 st 2014 Semiannual CEMS Report (07/30/2014)	2520- 00027-V12	EQT 0203 Crude Heater	01/15/2014 (1 hour)	SO ₂ (24.16 lb/hr)	Not Reported	Fuel gas H ₂ S was elevated due to an unknown cause	Emission Rates for Criteria Pollutants
	1 st 2014 Semiannual Monitoring and Deviation Report (09/30/2014)							
A3.	Unauthorized Discharge Notification Report-60 Day Follow-up. T155480 (06/20/2014)	2520- 00027- V13	EQT 0423 Refinery Startup/ Shutdown to flares [Flare No. 1- EQT 0013, Flare No. 3- EQT 0007, and Flare No. 4- EQT 0360]	04/23/2014- 04/24/2014 (2.88 hours)	SO ₂ (428.9 lb/hr)	6868.5	Flaring associated with a Coker Wet Gas Compressor malfunctioned during a planned shutdown. A valve needed in order to decrease compressor loading closed too quickly, which caused the WGC to trip offline. The incident was reported as preventable.	Emission Rates for Criteria Pollutants. Emissions Rates for TAP/HAP and other Pollutants
	1 st 2014 Semiannual Monitoring and Deviation Report (09/30/2014)				H ₂ S (2.12 lb/hr)	36.9		
B3.	1 st 2014 Semiannual Monitoring and Deviation Report (09/30/2014)	2520- 00027-V12	EQT 203 Crude Heater	01/15/2014 (2 hours)	SO ₂ (Crude Heater: 27.16 lb/hr HCU Heater: 6.36 lb/hr)	Not reported	Fuel gas H ₂ S was elevated due to an unknown cause. The specifies in this report correct the hours and source identifier reported in the 1 st Half 2014 CEMS Report dated 7/30/2014	Emission Rates for Criteria Pollutants
			EQT 211 HCU 2 nd Stage Heater			Not reported		

	REPORT (date)	PERMIT NUMBER	EMISSION POINT/UNIT	INCIDENT DATE (Duration)	POLLUTANTS RELEASED (Permit Limit)	QUANTITY REPORTED (in lbs)	REPORTED CAUSE	REGULATORY or PERMIT REQUIREMENTS
C3.	2 nd 2014 Semiannual CEMS Report (01/30/2015)	2520-00027-V13	EQT 0060 DHT Stripper Reboiler	07/21/2014 (2 hours)	SO ₂ (2.77 lb/hr)	Not Reported	High H ₂ S in the fuel gas due to an increase in off-gas at the Naphtha Hydrotreater	Emission Rates for Criteria Pollutants
	2 nd 2014 Semiannual Monitoring and Deviation Report (03/31/2015)							
D3.	2 nd 2014 Semiannual CEMS Report (01/30/2015)	2520-00027-V13	EQT 0204 Vacuum Heater	07/21/2014 (2 hours)	SO ₂ (12.26 lb/hr)	Not Reported	High H ₂ S in the fuel gas due to an increase in off-gas at the Naphtha Hydrotreater	Emission Rates for Criteria Pollutants
	2 nd 2014 Semiannual Monitoring and Deviation Report (03/31/2015)							
E3.	2 nd 2014 Semiannual CEMS Report (01/30/2015)	2520-00027-V13	EQT 0013 Flare No. 1	09/17/2014 (1 hour)	SO ₂ (50.00 lb/hr)	Not Reported	Prior to source being identified, the flaring ceased	Emission Rates for Criteria Pollutants
	2 nd 2014 Semiannual Monitoring and Deviation Report (03/31/2015)							
F3.	2 nd 2014 Semiannual CEMS Report (01/30/2015)	2520-00027-V13	EQT 0360 Flare No. 4	09/17/2014 (1 hour)	SO ₂ (25.00 lb/hr)	Not Reported	Prior to source being identified, the flaring ceased	Emission Rates for Criteria Pollutants
	2 nd 2014 Semiannual Monitoring and Deviation Report (03/31/2015)							
G3.	1 st 2015 Semiannual CEMS Report (07/30/2015)	2520-00027-V13	EQT 0060 DHT Stripper Reboiler	02/26/2015 (1 hour)	SO ₂ (2.77 lb/hr)	Not reported	During the planned shutdown of the 1600 SRU, the unit shifted the loads to the 30 and 3700 SRUs. The 30 SRU had trouble maintaining an effective stripping rate on the amine regenerator.	Emission Rates for Criteria Pollutants
	1 st 2015 Semiannual Monitoring and Deviation Report (09/29/2015)							

	REPORT (date)	PERMIT NUMBER	EMISSION POINT/UNIT	INCIDENT DATE (Duration)	POLLUTANTS RELEASED (Permit Limit)	QUANTITY REPORTED (in lbs)	REPORTED CAUSE	REGULATORY or PERMIT REQUIREMENTS
H3.	1 st 2015 Semiannual CEMS Report (07/30/2015)	2520-00027-V14	EQT 0241 Thermal Oxidizer, 1600 TOX	04/23/2015 (1 hour)	SO ₂ (115.31 lb/hr)	Not reported	The 1600 TOX shutdown on low fuel gas pressure. Operations purged the TOX and relit it before the temperature dropped below 600 degrees.	Emission Rates for Criteria Pollutants
	1 st 2015 Semiannual Monitoring and Deviation Report (09/29/2015)							
I3.	1 st 2015 Semiannual CEMS Report (07/30/2015)	2520-00027-V13	EQT 0013 Flare No.1	01/27/2015 (2 hours)	VOC (28.5 lb/hr)	Not reported	A PSV on refrigerant compressor in the Alkylation unit relieved at 66 psig instead of its set pressure of 93 psig. The PSV material was diverted to the flares and flare gas recovery unit.	Emission Rates for Criteria Pollutants
	1 st 2015 Semiannual Monitoring and Deviation Report (09/29/2015)			01/27/2015 (1 hour)	NOx (31.0 lb/hr)	Not Reported		
				01/27/2015 (1 hour)	CO (168.3 lb/hr)	Not Reported		
				01/27/2015 (1 hour)	SO ₂ (50.0 lb/hr)	Not Reported		
J3.	1 st 2015 Semiannual CEMS Report (07/30/2015)	2520-00027-V13	EQT 0007 Flare No. 2	01/27/2015 (1 hour)	VOC (28.5 lb/hr)	Not reported	A PSV on refrigerant compressor in the Alkylation unit relieved at 66 psig instead of its set pressure of 93 psig. The PSV material was diverted to the flares and flare gas recovery unit.	Emission Rates for Criteria Pollutants
	1 st 2015 Semiannual Monitoring and Deviation Report (09/29/2015)							
K3.	1 st 2015 Semiannual CEMS Report (07/30/2015)	2520-00027-V13	EQT 0360 Flare No. 4	01/27/2015 (1 hour)	VOC (4.74 lb/hr)	Not reported	A PSV on refrigerant compressor in the Alkylation unit relieved at 66 psig instead of its set pressure of 93 psig. The PSV material was diverted to the flares and flare gas recovery unit.	Emission Rates for Criteria Pollutants
	1 st 2015 Semiannual Monitoring and Deviation Report (09/29/2015)							

	REPORT (date)	PERMIT NUMBER	EMISSION POINT/UNIT	INCIDENT DATE (Duration)	POLLUTANTS RELEASED (Permit Limit)	QUANTITY REPORTED (in lbs)	REPORTED CAUSE	REGULATORY or PERMIT REQUIREMENTS
L3.	1 st 2015 Semiannual CEMS Report (07/30/2015)	2520-00027-V13	EQT 0013 Flare No.1	02/03/2015 (1 hour)	VOC (28.5 lb/hr)	Not reported	During swapping of a compressor in the Alkylation unit, a PSV lifted at 72 psig instead of the 93 psig design rating. The PSV material was diverted to the flares and flare gas recovery system.	Emission Rates for Criteria Pollutants
	1 st 2015 Semiannual Monitoring and Deviation Report (09/29/2015)							
M3.	1 st 2015 Semiannual CEMS Report (07/30/2015)	2520-00027-V13	EQT 0360 Flare No. 4	02/10/2015 (1 hour)	VOC (4.74 lb/hr)	Not reported	Unknown: Prior to the source being identified, the flaring ceased	Emission Rates for Criteria Pollutants
	1 st 2015 Semiannual Monitoring and Deviation Report (09/29/2015)							
N3.	1 st 2015 Semiannual CEMS Report (07/30/2015)	2520-00027-V14	EQT 0013 Flare No.1	05/04/2015 (1 hour)	VOC (28.5 lb/hr)	Not reported	Unknown: Prior to the source being identified, the flaring ceased	Emission Rates for Criteria Pollutants
	1 st 2015 Semiannual Monitoring and Deviation Report (09/29/2015)			05/04/2015 (1 hour)	SO ₂ (50.0 lb/hr)			
O3.	1 st 2015 Semiannual CEMS Report (07/30/2015)	2520-00027-V14	EQT 0013 Flare No. 1	05/11/2015 (3 hours)	VOC (28.5 lb/hr)	Not reported	Unknown: Prior to the source being identified, the flaring ceased	Emission Rates for Criteria Pollutants
	1 st 2015 Semiannual Monitoring and Deviation Report (09/29/2015)							
P3.	1 st 2015 Semiannual CEMS Report (07/30/2015)	2520-00027-V14	EQT 0013 Flare No. 1	05/19/2015 (1 hour)	VOC (28.5 lb/hr)	Not reported	A common oil system is shared between three wet gas compressors in the FCCU unit. While isolating the oil system to the F-Wet Gas Compressor, the E-Wet Gas Compressor tripped on low oil pressure. The trip resulted in wet gas diverting to the flares and flare gas recovery unit.	Emission Rates for Criteria Pollutants
	1 st 2015 Semiannual Monitoring and Deviation Report (09/29/2015)			05/19/2015 (1 hour)	SO ₂ (50.0 lb/hr)			

	REPORT (date)	PERMIT NUMBER	EMISSION POINT/UNIT	INCIDENT DATE (Duration)	POLLUTANTS RELEASED (Permit Limit)	QUANTITY REPORTED (in lbs)	REPORTED CAUSE	REGULATORY or PERMIT REQUIREMENTS
Q3.	1 st 2015 Semiannual CEMS Report (07/30/2015)	2520- 00027-V14	EQT 0013 Flare No. 1	05/28/2015 (1 hour)	VOC (28.5 lb/hr)	Not reported	Unknown: Prior to the source being identified, the flaring ceased	Emission Rates for Criteria Pollutants
	1 st 2015 Semiannual Monitoring and Deviation Report (09/29/2015)							
R3.	1 st 2015 Semiannual CEMS Report (07/30/2015)	2520- 00027-V14	EQT 0013 Flare No. 1	06/14/2015 (1 hour)	VOC (28.5 lb/hr)	Not reported	Unknown: Prior to the source being identified, the flaring ceased	Emission Rates for Criteria Pollutants
	1 st 2015 Semiannual Monitoring and Deviation Report (09/29/2015)							
S3.	1 st 2015 Semiannual CEMS Report (07/30/2015)	2520- 00027-V14	EQT 0013 Flare No. 1	06/25/2015 (1 hour)	VOC (28.5 lb/hr)	Not reported	Unknown: Prior to the source being identified, the flaring ceased.	Emission Rates for Criteria Pollutants
	1 st 2015 Semiannual Monitoring and Deviation Report (09/29/2015)							
T3.	1 st 2015 Semiannual Monitoring and Deviation Report (09/29/2015)	2520- 00027-V14	EQT 0060 Heater 15-05	03/01/2015 (1 hour)	NO _x (4.32 lb/hr)	Not reported	A change in the fuel gas higher heating value resulted in the increased firing rate above permitted limits.	Emission Rates for Criteria Pollutants
U3.	2 nd 2015 Semiannual CEMS Report (01/29/2016)	2520- 00027-V14	EQT 0196 Thermal Oxidizer, 30 TOX	07/17/2015 (1 hour)	SO ₂ (115.31 lb/hr)	Not reported	The seal legs were leaking sulfur through the accumulator to the 30 TOX.	Emission Rates for Criteria Pollutants
	2 nd 2015 Semiannual Monitoring and Deviation Report (03/31/2016)							

	REPORT (date)	PERMIT NUMBER	EMISSION POINT/UNIT	INCIDENT DATE (Duration)	POLLUTANTS RELEASED (Permit Limit)	QUANTITY REPORTED (in lbs)	REPORTED CAUSE	REGULATORY or PERMIT REQUIREMENTS
V3.	2 nd 2015 Semiannual CEMS Report (01/29/2016)	2520-00027-V14	EQT 0196 Thermal Oxidizer, 30 TOX	08/03/2015 (1 hour)	SO ₂ (115.31 lb/hr)	Not reported	The seal legs were leaking sulfur through the accumulator to the 30 TOX. The legs were blocked in and the sulfur traps were cleaned.	Emission Rates for Criteria Pollutants
	2 nd 2015 Semiannual Monitoring and Deviation Report (03/31/2016)							
W3.	2 nd 2015 Semiannual CEMS Report (01/29/2016)	2520-00027-V14	EQT 0241 Thermal Oxidizer, 1600 TOX	09/10/2015 (1 hour)	SO ₂ (115.31 lb/hr)	Not reported	The eductor line from the accumulator to the 1600 TOX was plugged with sulfur.	Emission Rates for Criteria Pollutants
	2 nd 2015 Semiannual Monitoring and Deviation Report (03/31/2016)							
X3.	2 nd 2015 Semiannual CEMS Report (01/29/2016)	2520-00027-V14	EQT 0094 GDU Heater	12/31/2015 (3 hours)	SO ₂ (5.13 lb/hr)	Not reported	The SRU tripped offline due to the unexpected behavior of the process control scheme while adding enriched O ₂ to the furnace. The SRU was unable to regenerate the amine used for scrubbing sulfur from the refinery fuel gas resulting in elevated fuel gas sulfur.	Emission Rates for Criteria Pollutants
			EQT 0212 HCU Fractionator Charge Heater	12/31/2015 (3 hours)	SO ₂ (10.54 lb/hr)	Not reported		
			EQT 0210 HCU 1 st Stage Charge Heater	12/31/2015 (2 hours)	SO ₂ (6.36 lb/hr)	Not reported		
			EQT 0080 Boiler B-401C	12/31/2015 (3 hours)	SO ₂ (9.08 lb/hr)	Not reported		
			EQT 0081 Boiler B-401D	12/31/2015 (3 hours)	SO ₂ (9.08 lb/hr)	Not reported		
			EQT 0029 Boiler 401-E	12/31/2015 (3 hours)	SO ₂ (10.77 lb/hr)	Not reported		
	2 nd 2015 Semiannual Monitoring and Deviation Report (03/31/2016)		GRP0012 ULSD Heater CAP	12/31/2015 (2 hours)	SO ₂ (6.36 lb/hr)	Not reported		
			EQT 0060 DHT Stripper Reboiler	12/31/2015 (3 hours)	SO ₂ (2.77 lb/hr)	Not reported		
			EQT 0203 Crude Heater	12/31/2015 (3 hours)	SO ₂ (24.16 lb/hr)	Not reported		
			GRP 0005 Coker Heater CAP	12/31/2015 (3 hours)	SO ₂ (19.90 lb/hr)	Not reported		
			GRP 0013 DHT Heater CAP	12/31/2015 (3 hours)	SO ₂ (3.59 lb/hr)	Not reported		
			EQT 0079 NHT Heater	12/31/2015 (2 hours)	SO ₂ (1.85 lb/hr)	Not reported		

	REPORT (date)	PERMIT NUMBER	EMISSION POINT/UNIT	INCIDENT DATE (Duration)	POLLUTANTS RELEASED (Permit Limit)	QUANTITY REPORTED (in lbs)	REPORTED CAUSE	REGULATORY or PERMIT REQUIREMENTS
Y3.	2 nd 2015 Semiannual CEMS Report (01/29/2016)	2520-00027-V14	EQT 0093 CCR Heater	12/31/2015 (2 hours)	SO ₂ (10.46 lb/hr)	Not reported	The SRU tripped offline due to the unexpected behavior of the process control scheme while adding enriched O ₂ to the furnace. The SRU was unable to regenerate the amine used for scrubbing sulfur from the refinery fuel gas resulting in elevate fuel gas sulfur.	Emission Rates for Criteria Pollutants
	2 nd 2015 Semiannual Monitoring and Deviation Report (03/31/2016)							
Z3.	2 nd 2015 Semiannual CEMS Report (01/29/2016)	2520-00027-V14	EQT 0013 Flare No. 1	07/07/2015 (2 hours)	VOC (28.5 lb/hr)	Not reported	More fuel was generated than could be consumed in process heaters	Emission Rates for Criteria Pollutants
	2 nd 2015 Semiannual Monitoring and Deviation Report (03/31/2016)							
A4.	2 nd 2015 Semiannual CEMS Report (01/29/2016)	2520-00027-V14	EQT 0360 Flare No. 4	07/14/2015 (1 hour)	VOC (4.74 lb/hr)	Not reported	More fuel was generated than could be consumed in process heaters	Emission Rates for Criteria Pollutants
	2 nd 2015 Semiannual Monitoring and Deviation Report (03/31/2016)							
B4.	2 nd 2015 Semiannual CEMS Report (01/29/2016)	2520-00027-V14	EQT 0013 Flare No. 1	07/15/2015 (6 hours)	VOC (28.5 lb/hr)	Not reported	More fuel was generated than could be consumed in process heaters	Emission Rates for Criteria Pollutants
	2 nd 2015 Semiannual Monitoring and Deviation Report (03/31/2016)							
C4.	2 nd 2015 Semiannual CEMS Report (01/29/2016)	2520-00027-V14	EQT 0360 Flare No. 4	07/16/2015 (3 hours)	VOC (4.74 lb/hr)	Not reported	More fuel was generated than could be consumed in process heaters	Emission Rates for Criteria Pollutants
	2 nd 2015 Semiannual Monitoring and Deviation Report (03/31/2016)							

	REPORT (date)	PERMIT NUMBER	EMISSION POINT/UNIT	INCIDENT DATE (Duration)	POLLUTANTS RELEASED (Permit Limit)	QUANTITY REPORTED (in lbs)	REPORTED CAUSE	REGULATORY or PERMIT REQUIREMENTS
D4.	2 nd 2015 Semiannual CEMS Report (01/29/2016)	2520- 00027-V14	EQT 0013 Flare No. 1	07/24/2015 (2 hours)	VOC (28.5 lb/hr)	Not reported	More fuel was generated than could be consumed in process heaters	Emission Rates for Criteria Pollutants
	2 nd 2015 Semiannual Monitoring and Deviation Report (03/31/2016)							
E4.	2 nd 2015 Semiannual CEMS Report (01/29/2016)	2520- 00027-V14	EQT 0013 Flare No. 1	07/29/2015 (2 hours)	VOC (28.5 lb/hr)	Not reported	More fuel was generated than could be consumed in process heaters	Emission Rates for Criteria Pollutants
	2 nd 2015 Semiannual Monitoring and Deviation Report (03/31/2016)							
F4.	2 nd 2015 Semiannual CEMS Report (01/29/2016)	2520- 00027-V14	EQT 0013 Flare No. 1	08/09/2015 (1 hour)	VOC (28.5 lb/hr)	Not reported	More fuel was generated than could be consumed in process heaters	Emission Rates for Criteria Pollutants
	2 nd 2015 Semiannual Monitoring and Deviation Report (03/31/2016)							
G4.	2 nd 2015 Semiannual CEMS Report (01/29/2016)	2520- 00027-V14	EQT 0013 Flare No. 1	08/10/2015 (1 hour)	VOC (28.5 lb/hr)	Not reported	More fuel was generated than could be consumed in process heaters	Emission Rates for Criteria Pollutants
	2 nd 2015 Semiannual Monitoring and Deviation Report (03/31/2016)							
H4.	2 nd 2015 Semiannual CEMS Report (01/29/2016)	2520- 00027-V14	EQT 0013 Flare No. 1	08/12/2015 (2 hours)	VOC (28.5 lb/hr)	Not reported	More fuel was generated than could be consumed in process heaters	Emission Rates for Criteria Pollutants
	2 nd 2015 Semiannual Monitoring and Deviation Report (03/31/2016)							

	REPORT (date)	PERMIT NUMBER	EMISSION POINT/UNIT	INCIDENT DATE (Duration)	POLLUTANTS RELEASED (Permit Limit)	QUANTITY REPORTED (in lbs)	REPORTED CAUSE	REGULATORY or PERMIT REQUIREMENTS
I4.	2 nd 2015 Semiannual CEMS Report (01/29/2016)	2520- 00027-V14	EQT 0013 Flare No. 1	08/29/2015 (1 hour)	VOC (28.5 lb/hr)	Not reported	Unknown: Prior to the source being identified, the flaring ceased	Emission Rates for Criteria Pollutants
	2 nd 2015 Semiannual Monitoring and Deviation Report (03/31/2016)							
J4.	2 nd 2015 Semiannual CEMS Report (01/29/2016)	2520- 00027-V14	EQT 0013 Flare No. 1	08/30/2015 (1 hour)	SO ₂ (50.0 lb/hr)	Not reported	More fuel was generated than could be consumed in process heaters	Emission Rates for Criteria Pollutants
	2 nd 2015 Semiannual Monitoring and Deviation Report (03/31/2016)			08/30/2015 (15 hours)	VOC (28.5 lb/hr)			
K4.	2 nd 2015 Semiannual CEMS Report (01/29/2016)	2520- 00027-V14	EQT 0013 Flare No. 1	09/19/2015 (5 hours)	VOC (28.5 lb/hr)	Not reported	A PSV on a compressor in the Alkylation unit was leaking. Material was diverted to the flares and flare gas recovery unit.	Emission Rates for Criteria Pollutants
	2 nd 2015 Semiannual Monitoring and Deviation Report (03/31/2016)							
L4.	2 nd 2015 Semiannual CEMS Report (01/29/2016)	2520- 00027-V14	EQT 0013 Flare No. 1	11/12/2015 (1 hour)	VOC (28.5 lb/hr)	Not reported	A PSV on a compressor in the Alkylation unit lifted prematurely. Material was diverted to the flares and flare gas recovery unit.	Emission Rates for Criteria Pollutants
	2 nd 2015 Semiannual Monitoring and Deviation Report (03/31/2016)			11/12/2015 (1 hour)	SO ₂ (50.0 lb/hr)			

	REPORT (date)	PERMIT NUMBER	EMISSION POINT/UNIT	INCIDENT DATE (Duration)	POLLUTANTS RELEASED (Permit Limit)	QUANTITY REPORTED (in lbs)	REPORTED CAUSE	REGULATORY or PERMIT REQUIREMENTS
M4.	2 nd 2015 Semiannual CEMS Report (01/29/2016)	2520-00027-V14	EQT 0007 Flare No. 2	11/10/2015 (3 hours)	VOC (28.5 lb/hr)	Not reported	An optical flow meter was installed to conform to Subpart Ja. Since installation, the flow meter has been outputting erroneous flow measurements even when flaring is not occurring. During this period, seal breakthrough occurred.	Emission Rates for Criteria Pollutants
				11/10/2015 (1 hour)	PM _{10/2.5} (1.0 lb/hr)	Not reported		
				11/10/2015 (1 hour)	NO _x (31.0 lb/hr)	Not reported		
				11/10/2015 (1 hour)	CO (168.3 lb/hr)	Not reported		
				11/12/2015 (2 hours)	VOC (28.5 lb/hr)	Not reported		
				11/13/2015 (1 hour)	VOC (28.5 lb/hr)	Not reported		
				11/14/2015 (4 hours)	VOC (28.5 lb/hr)	Not reported		
				11/14/2015 (3 hours)	PM _{10/2.5} (1.0 lb/hr)	Not reported		
				11/14/2015 (3 hours)	NO _x (31.0 lb/hr)	Not reported		
				11/14/2015 (3 hours)	CO (168.3 lb/hr)	Not reported		
	11/15/2015 (2 hours)			VOC (28.5 lb/hr)	Not reported			
	11/20/2015 (1 hour)			VOC (28.5 lb/hr)	Not reported			
	11/21/2015 (2 hours)			VOC (28.5 lb/hr)	Not reported			
	11/22/2015 (1 hour)			VOC (28.5 lb/hr)	Not reported			
	11/23/2015 (3 hours)			VOC (28.5 lb/hr)	Not reported			
	11/23/2015 (1 hour)			SO ₂ (50.0 lb/hr)	Not reported			
	11/30/2015 (2 hours)			VOC (28.5 lb/hr)	Not reported			
	11/30/2015 (1 hour)			PM _{10/2.5} (1.0 lb/hr)	Not reported			
	11/30/2015 (1 hour)			NO _x (31.0 lb/hr)	Not reported			
	11/30/2015 (1 hour)			CO (168.3 lb/hr)	Not reported			
N4.	2 nd 2015 Semiannual CEMS Report (01/29/2016)	2520-00027-V14	EQT 0034 Flare No. 3	11/30/2015 (3 hours)	VOC (4.74 lb/hr)	Not reported	Liquids built up in a line preventing waste gas from routing to the flare gas recovery unit.	Emission Rates for Criteria Pollutants
	12/01/2015 (3 hours)			VOC (4.74 lb/hr)	Not reported			
	12/02/2015 (1 hour)			VOC (4.74 lb/hr)	Not reported			

	REPORT (date)	PERMIT NUMBER	EMISSION POINT/UNIT	INCIDENT DATE (Duration)	POLLUTANTS RELEASED (Permit Limit)	QUANTITY REPORTED (in lbs)	REPORTED CAUSE	REGULATORY or PERMIT REQUIREMENTS
O4.	2 nd 2015 Semiannual CEMS Report (01/29/2016)	2520- 00027-V14	EQT 0007 Flare No. 2	12/07/2015 (16 hours)	VOC (28.5 lb/hr)	Not reported	Unknown: Prior to the source being identified, the flaring ceased	Emission Rates for Criteria Pollutants
	2 nd 2015 Semiannual Monitoring and Deviation Report (03/31/2016)							
P4.	2 nd 2015 Semiannual CEMS Report (01/29/2016)	2520- 00027-V14	EQT 0013 Flare No. 1	12/13/2015 (9 hours)	VOC (28.5 lb/hr)	Not reported	Unknown: Prior to the source being identified, the flaring ceased	Emission Rates for Criteria Pollutants
	2 nd 2015 Semiannual Monitoring and Deviation Report (03/31/2016)							
Q4.	2 nd 2015 Semiannual CEMS Report (01/29/2016)	2520- 00027-V14	EQT 0013 Flare No. 1	12/16/2015 (2 hours)	VOC (28.5 lb/hr)	Not reported	Unknown: Prior to the source being identified, the flaring ceased	Emission Rates for Criteria Pollutants
	2 nd 2015 Semiannual Monitoring and Deviation Report (03/31/2016)							
R4.	2 nd 2015 Semiannual CEMS Report (01/29/2016)	2520- 00027-V14	EQT 0360 Flare No. 4	12/16/2015 (2 hours)	VOC (4.74 lb/hr)	Not reported	Unknown: Prior to the source being identified, the flaring ceased	Emission Rates for Criteria Pollutants
	2 nd 2015 Semiannual Monitoring and Deviation Report (03/31/2016)							
S4.	2 nd 2015 Semiannual CEMS Report (01/29/2016)	2520- 00027-V14	EQT 0360 Flare No. 4	12/19/2015 (2 hours)	VOC (4.74 lb/hr)	Not reported	Unknown: Prior to the source being identified, the flaring ceased	Emission Rates for Criteria Pollutants
	2 nd 2015 Semiannual Monitoring and Deviation Report (03/31/2016)			12/19/2015 (1 hour)	PM _{10.25} (1.0 lb/hr)	Not reported		

	REPORT (date)	PERMIT NUMBER	EMISSION POINT/UNIT	INCIDENT DATE (Duration)	POLLUTANTS RELEASED (Permit Limit)	QUANTITY REPORTED (in lbs)	REPORTED CAUSE	REGULATORY or PERMIT REQUIREMENTS
T4	2 nd 2015 Semiannual CEMS Report (01/29/2016)	2520-00027-V14	EQT 0013 Flare No. 1	12/19/2015 (4 hours)	VOC (28.5 lb/hr)	Not reported	A barge was brought onsite due to excess butane/butylene (BB) inventory from a malfunction in the alkylation units. Prior to the barge accepting the BB inventory, the barge was depressured to the flare	Emission Rates for Criteria Pollutants
	2 nd 2015 Semiannual Monitoring and Deviation Report (03/31/2016)							
U4.	2 nd 2015 Semiannual CEMS Report (01/29/2016)	2520-00027-V14	EQT 0013 Flare No. 1	12/20/2015 (3 hours)	VOC (28.5 lb/hr)	Not reported	A PSV on a compressor in the Alkylation unit was leaking. Material was diverted to the flares and flare gas recovery unit.	Emission Rates for Criteria Pollutants
	2 nd 2015 Semiannual Monitoring and Deviation Report (03/31/2016)			12/20/2015 (1 hour)	SO ₂ (50.0 lb/hr)			
V4.	2 nd 2015 Semiannual CEMS Report (01/29/2016)	2520-00027-V14	EQT 0013 Flare No. 1	12/25/2015 (1 hour)	SO ₂ (50.0 lb/hr)	Not reported	Unknown: Prior to the source being identified, the flaring ceased	Emission Rates for Criteria Pollutants
	2 nd 2015 Semiannual Monitoring and Deviation Report (03/31/2016)			12/25/2015 (6 hours)	VOC (28.5 lb/hr)			
				12/25/2015 (9 hours)	H ₂ S (1.28 lb/hr)			
W4.	2 nd 2015 Semiannual CEMS Report (01/29/2016)	2520-00027-V14	EQT 0013 Flare No. 1	12/29/2015 (1 hour)	VOC (28.5 lb/hr)	Not reported	Unknown: Prior to the source being identified, the flaring ceased	Emission Rates for Criteria Pollutants
	2 nd 2015 Semiannual Monitoring and Deviation Report (03/31/2016)							
X4.	2 nd 2015 Semiannual CEMS Report (01/29/2016)	2520-00027-V14	EQT 0360 Flare No. 4	12/29/2015 (1 hour)	VOC (4.74 lb/hr)	Not reported	Unknown: Prior to the source being identified, the flaring ceased	Emission Rates for Criteria Pollutants
	2 nd 2015 Semiannual Monitoring and Deviation Report (03/31/2016)							

Each emission exceedance is a violation of any applicable permit and associated requirement(s) listed above, LAC 33:III.501.C.4, La. R.S. 30:2057(A)(1), and 30:2057(A)(2).

XII.

The Respondent reported the following deviations from fugitive emission requirements:

	REPORT (date)	PERMIT NUMBER	EMISSION POINT	INCIDENT DATE	REPORTED CAUSE	REGULATORY or PERMIT REQUIREMENTS
A.	1 st Semiannual 2014 LDAR Monitoring and Consent Decree Report (08/29/2014)	2520-00027-V13	FUG 0026 Refinery Fugitive Emissions	01/01/2014-06/30/2014	There was a window of four (4) months in which one of the pumps could have been taken out of service for repair, but was not repaired during the 1st 2014 semiannual period as stated in the audit findings.	LAC 33:III.5109.A. Specific Requirement 145
	2 nd Semiannual 2014 LDAR and Consent Decree Report (02/27/2015)					
B.	1 st Semiannual 2014 LDAR Monitoring and Consent Decree Report (08/29/2014)	2520-00027-V13	FUG 0026 Refinery Fugitive Emissions	01/01/2014-06/30/2014	One (1) OEL was observed in process units during walkthrough; OEL did not have a plug	LAC 33:III.5109.A. Specific Requirement 133
	2 nd Semiannual 2014 LDAR and Consent Decree Report (02/27/2015)					
C.	2015 Title V Annual Compliance Certification (03/31/2016)	2520-00027-V13/14	CRG 0017 Refinery Fugitives Common Requirements	NA	Nine (9) valves and eight (8) connectors were discovered that were not in the LDAR program that resulted in 34 missed monitoring events.	LAC 33:III.5109.A. Specific Requirements 99.136

Each failure to meet fugitive emission requirements is a violation of any applicable permit and associated requirement(s) listed above, LAC 33:III.501.C.4, LAC 33:III.2122.C.3, La. R.S. 30:2057(A)(1), and 30:2057(A)(2).

XIII.

The Respondent failed to meet the following reporting requirements:

	REPORT (date)	PERMIT NUMBER	REPORTING REQUIREMENT	DUE DATE	SUBMITTAL DATE	REGULATORY or PERMIT REQUIREMENTS
A.	NSPS QQQ Periodic Report (07/30/2014)	2520-00027-V13	Submit initial certification within 60 days after initial startup. The tank, T-325-7, came online 04/09/2014 includes a water draw system subject to 40 CFR 60 QQQ.	06/08/2014	06/27/2014	40 CFR 60.698(b)(1)

	REPORT (date)	PERMIT NUMBER	REPORTING REQUIREMENT	DUE DATE	SUBMITTAL DATE	REGULATORY or PERMIT REQUIREMENTS
B.	1 st 2014 Semiannual Monitoring and Deviation Report (09/30/2014)	2520-00027- V12/V13	In the event of an unauthorized discharge that exceeds a reportable quantity, the discharger shall promptly notify DPS by telephone within 24 hours after learning of the discharge	During SRU shutdown for the 2014 turnaround, SO ₂ was emitted in excess of the permit limit and reportable quantity (RQ). Notification was made 24 hours after exceeding RQ	Respondent failed to submit notification that RQ was reached during shutdown	LAC 33:1.3917.A. Specific requirement 987
C.	2013 Annual Compliance Certification	3099-V0	Submit the annual compliance certification by March 31 st for the preceding calendar year	03/31/2014	Not submitted	LAC 33:III.535. Specific Requirement 46
D.	1 st 2014 Semiannual Monitoring Report	3099-V0	Submit semiannual report by September 30 th for the preceding period encompassing January through June.	09/30/2014	Not submitted	LAC 33:III.535. Specific Requirement 46
E.	2 nd 2014 Semiannual Monitoring Report	3099-V0	Submit semiannual report by March 31 st for the preceding period encompassing July through December	03/31/2015	Not submitted	LAC 33:III.535. Specific Requirement 46
F.	2014 Annual Compliance Certification	3099-V0	Submit the annual compliance certification by March 31 st for the preceding calendar year	03/31/2015	Not submitted	LAC 33:III.535. Specific Requirement 46
G.	1 st 2015 Semiannual Monitoring Report	3099-V0	Submit semiannual report by September 30 th for the preceding period encompassing January through June.	09/30/2015	Not submitted	LAC 33:III.535, Specific Requirement 46
H.	2 nd 2015 Semiannual Monitoring Report	3099-V0	Submit semiannual report by March 31 st for the preceding period encompassing July through December	03/31/2016	Not submitted	LAC 33:III.535. Specific Requirement 46
I.	2015 Annual Compliance Certification	3099-V0	Submit the annual compliance certification by March 31 st for the preceding calendar year	03/31/2016	Not submitted	LAC 33:III.535. Specific Requirement 46

	REPORT (date)	PERMIT NUMBER	REPORTING REQUIREMENT	DUE DATE	SUBMITTAL DATE	REGULATORY or PERMIT REQUIREMENTS
J.	1 st 2016 Semiannual Monitoring Report	3099-V0	Submit semiannual report by September 30 th for the preceding period encompassing January through June.	09/30/2016	Not submitted	LAC 33:III.535, Specific Requirement 46
K.	2 nd 2016 Semiannual Monitoring Report	3099-V0	Submit semiannual report by March 31 st for the preceding period encompassing July through December	03/31/2017	Not submitted	LAC 33:III.535, Specific Requirement 46
L.	2016 Annual Compliance Certification	3099-V0	Submit the annual compliance certification by March 31 st for the preceding calendar year	03/31/2017	Not submitted	LAC 33:III.535, Specific Requirement 46
M.	2 nd 2013 Semiannual Monitoring Report	3111-V0	Submit semiannual report by March 31 st for the preceding period encompassing July through December	03/31/2014	Not submitted	LAC 33:III.535, Specific Requirement 33
N.	2013 Annual Compliance Certification	3111-V0	Submit the annual compliance certification by March 31 st for the preceding calendar year	03/31/2014	Not submitted	LAC 33:III.535, Specific Requirement 33
O.	1 st 2014 Semiannual Monitoring Report	3111-V0	Submit semiannual report by September 30 th for the preceding period encompassing January through June.	09/30/2014	Not submitted	LAC 33:III.535, Specific Requirement 33
P.	2 nd 2014 Semiannual Monitoring Report	3111-V0	Submit semiannual report by March 31 st for the preceding period encompassing July through December	03/31/2015	Not submitted	LAC 33:III.535, Specific Requirement 33
Q.	2014 Annual Compliance Certification	3111-V0	Submit the annual compliance certification by March 31 st for the preceding calendar year	03/31/2015	Not submitted	LAC 33:III.535, Specific Requirement 33
R.	1 st 2015 Semiannual Monitoring Report	3111-V0	Submit semiannual report by September 30 th for the preceding period encompassing January through June.	09/30/2015	Not submitted	LAC 33:III.535, Specific Requirement 33
S.	2 nd 2015 Semiannual Monitoring Report	3111-V0	Submit semiannual report by March 31 st for the preceding period encompassing July through December	03/31/2016	Not submitted	LAC 33:III.535, Specific Requirement 33
T.	2015 Annual Compliance Certification	3111-V0	Submit the annual compliance certification by March 31 st for the preceding calendar year	03/31/2016	Not submitted	LAC 33:III.535, Specific Requirement 33

	REPORT (date)	PERMIT NUMBER	REPORTING REQUIREMENT	DUE DATE	SUBMITTAL DATE	REGULATORY or PERMIT REQUIREMENTS
U.	1 st 2016 Semiannual Monitoring Report	3111-V0	Submit semiannual report by September 30 th for the preceding period encompassing January through June.	09/30/2016	Not submitted	LAC 33:III.535. Specific Requirement 33
V.	2 nd 2016 Semiannual Monitoring Report	3111-V0	Submit semiannual report by March 31 st for the preceding period encompassing July through December	03/31/2017	Not submitted	LAC 33:III.535. Specific Requirement 33
W.	2016 Annual Compliance Certification	3111-V0	Submit the annual compliance certification by March 31 st for the preceding calendar year	03/31/2017	Not submitted	LAC 33:III.535. Specific Requirement 33

Each failure to meet reporting requirements is a violation of applicable permits and associated requirement(s) listed above, LAC 33:III.501.C.4, La. R.S. 30:2057(A)(1), and 30:2057(A)(2).

XIV.

The Respondent reported the following recordkeeping violations:

	REPORT (date)	PERMIT NUMBER	EMISSION POINT/UNIT	INCIDENT DATE	RECORD REQUIREMENT	REPORTED CAUSE	REGULATORY or PERMIT REQUIREMENTS
A.	1 st 2015 Semiannual MACT Report (08/28/2015)	2520-00027-V14	Group 2 Tank	04/01/2015-04/30/2015	The minimum degree of data availability shall be at least 90% (based on a monthly average) of the operating time of the emissions unit; or activity being monitored	<90% data retention on calendar month basis. The electronic monitoring system was not functioning and the hard copies were not legible for this timeframe.	LAC 33:III.535. Specific Requirement 951
B.	2 nd 2015 Semiannual MACT Report (02/25/2016)	2520-00027-V14	Thermal Oxidizer Control Device	07/01/2015-07/31/2015	The minimum degree of data availability shall be at least 90% (based on a monthly average) of the operating time of the emissions unit; or activity being monitored	The data for thermal oxidizer temperature was not retained at a rate greater than 90%; actual rate of retention 60%	LAC 33:III.535. Specific Requirement 951
C.	2 nd 2015 Semiannual MACT Report (02/25/2016)	2520-00027-V14	Thermal Oxidizer Control Device	08/01/2015-08/31/2015	The minimum degree of data availability shall be at least 90% (based on a monthly average) of the operating time of the emissions unit; or activity being monitored	The data for thermal oxidizer temperature was not retained at a rate greater than 90%; actual rate of retention 54 %	LAC 33:III.535. Specific Requirement 951

Each failure to maintain the required records is a violation of: the applicable permit, any associated permit requirement listed above, LAC 33:III.501.C.4, La. R.S. 30:2057(A)(1) and (2).

COMPLIANCE ORDER

Based on the foregoing, the Respondent is **hereby ordered**:

I.

To take, immediately upon receipt of this **COMPLIANCE ORDER**, any and all steps necessary to meet and maintain compliance with the Act, the Air Quality Regulations, and all applicable permits.

II.

To submit to the Enforcement Division, within thirty (30) days after receipt of this **COMPLIANCE ORDER**, a written report listing the corrective action(s) taken to address the Management of Change (MOCs) documentation deficiencies as cited in Paragraph X.X of the **FINDINGS OF FACT** portion of this action.

III.

To submit to the Enforcement Division, within sixty (60) days after receipt of this **COMPLIANCE ORDER**, a written report that includes the quantities for the emission exceedances not reported in Paragraph XI of the **FINDINGS OF FACT** portion of this action.

IV.

To submit to the Enforcement Division, within forty-five (45) days after receipt of this **COMPLIANCE ORDER**, the reports that were not submitted as cited in Paragraph XIII.C-W of the **FINDINGS OF FACT** portion of this action.

V.

To submit to the Enforcement Division, within thirty (30) days after receipt of this **COMPLIANCE ORDER**, a written report that includes a detailed description of the circumstances surrounding the cited violations and actions taken or to be taken to achieve compliance with the Order Portion of this **COMPLIANCE ORDER**. This report and all other reports or information required to be submitted to the Enforcement Division by this **COMPLIANCE ORDER** shall be submitted to:

Office of Environmental Compliance
Post Office Box 4312
Baton Rouge, Louisiana 70821-4312
Attn: Antoinette Cobb
Re: Enforcement Tracking No. AE-CN-16-00273
Agency Interest No. 26003

THE RESPONDENT SHALL FURTHER BE ON NOTICE THAT:

I.

The Respondent has a right to an adjudicatory hearing on a disputed issue of material fact or of law arising from this **COMPLIANCE ORDER**. This right may be exercised by filing a written request with the Secretary no later than thirty (30) days after receipt of this **COMPLIANCE ORDER**.

II.

The request for an adjudicatory hearing shall specify the provisions of the **COMPLIANCE ORDER** on which the hearing is requested and shall briefly describe the basis for the request. This request should reference the Enforcement Tracking Number and Agency Interest Number, which are located in the upper right-hand corner of the first page of this document and should be directed to the following:

Department of Environmental Quality
Office of the Secretary
Post Office Box 4302
Baton Rouge, Louisiana 70821-4302
Attn: Hearings Clerk, Legal Division
Re: Enforcement Tracking No. AE-CN-16-00273
Agency Interest No. 26003

III.

Upon the Respondent's timely filing a request for a hearing, a hearing on the disputed issue of material fact or of law regarding this **COMPLIANCE ORDER** may be scheduled by the Secretary of the Department. The hearing shall be governed by the Act, the Administrative Procedure Act (La. R.S. 49:950, et seq.), and the Division of Administrative Law (DAL) Procedural Rules. The Department may amend or supplement this **COMPLIANCE ORDER** prior to the hearing, after providing sufficient notice and an opportunity for the preparation of a defense for the hearing.

IV.

This **COMPLIANCE ORDER** shall become a final enforcement action unless the request for hearing is timely filed. Failure to timely request a hearing constitutes a waiver of the Respondent's right to a hearing on a disputed issue of material fact or of law under Section 2050.4 of the Act for the violation(s) described herein.

V.

The Respondent's failure to request a hearing or to file an appeal or the Respondent's withdrawal of a request for hearing on this **COMPLIANCE ORDER** shall not preclude the Respondent from contesting the findings of facts in any subsequent penalty action addressing the same violation(s), although

the Respondent is estopped from objecting to this **COMPLIANCE ORDER** becoming a permanent part of its compliance history.

VI.

Civil penalties of not more than twenty-seven thousand five hundred dollars (\$27,500) for each day of violation for the violation(s) described herein may be assessed. For violations which occurred on August 15, 2004, or after, civil penalties of not more than thirty-two thousand five hundred dollars (\$32,500) may be assessed for each day of violation. The Respondent's failure or refusal to comply with this **COMPLIANCE ORDER** and the provisions herein will subject the Respondent to possible enforcement procedures under La. R.S. 30:2025, which could result in the assessment of a civil penalty in an amount of not more than fifty thousand dollars (\$50,000) for each day of continued violation or noncompliance.

VII.

For each violation described herein, the Department reserves the right to seek civil penalties in any manner allowed by law, and nothing herein shall be construed to preclude the right to seek such penalties.

NOTICE OF POTENTIAL PENALTY

I.

Pursuant to La. R.S. 30:2050.3(B), you are hereby notified that the issuance of a penalty assessment is being considered for the violation(s) described herein. Written comments may be filed regarding the violation(s) and the contemplated penalty. If you elect to submit comments, it is requested that they be submitted within ten (10) days of receipt of this notice.

II.

Prior to the issuance of additional appropriate enforcement action(s), you may request a meeting with the Department to present any mitigating circumstances concerning the violation(s). If you would like to have such a meeting, please contact Antoinette Cobb at (225) 219-3072 within ten (10) days of receipt of this **NOTICE OF POTENTIAL PENALTY**.

III.

The Department is required by La. R.S. 30:2025(E)(3)(a) to consider the gross revenues of the Respondent and the monetary benefits of noncompliance to determine whether a penalty will be assessed and the amount of such penalty. Please forward the Respondent's most current annual gross revenue statement along with a statement of the monetary benefits of noncompliance for the cited violation(s) to the above named contact person within ten (10) days of receipt of this **NOTICE OF POTENTIAL**

PENALTY. Include with your statement of monetary benefits the method(s) you utilized to arrive at the sum. If you assert that no monetary benefits have been gained, you are to fully justify that statement. If the Respondent chooses not to submit the requested most current annual gross revenues statement within ten (10) days, it will be viewed by the Department as an admission that the Respondent has the ability to pay the statutory maximum penalty as outlined in La. R.S. 30:2025.

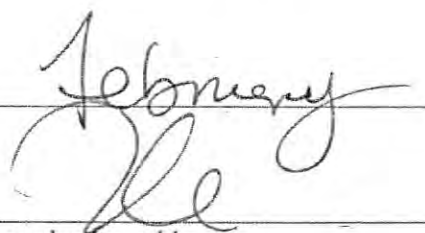
IV.

The Department assesses civil penalties based on LAC 33:I.Subpart1.Chapter7. To expedite closure of this **NOTICE OF POTENTIAL PENALTY** portion, the Respondent may offer a settlement amount to resolve any claim for civil penalties for the violation(s) described herein. The Respondent may offer a settlement amount, but the Department is under no obligation to enter into settlement negotiations. The decision to proceed with a settlement is at the discretion of the Department. The settlement offer amount may be entered on the attached "**CONSOLIDATED COMPLIANCE ORDER AND NOTICE OF POTENTIAL PENALTY REQUEST TO CLOSE**" form. The Respondent must include a justification of the offer. **DO NOT** submit payment of the offer amount with the form. The Department will review the settlement offer and notify the Respondent as to whether the offer is or is not accepted.

V.

This **CONSOLIDATED COMPLIANCE ORDER & NOTICE OF POTENTIAL PENALTY** is effective upon receipt.

Baton Rouge, Louisiana, this 5th day of February, 2019.



Lourdes Iturralde
Assistant Secretary
Office of Environmental Compliance

Copies of a request for a hearing and/or related correspondence should be sent to:

Louisiana Department of Environmental Quality
Office of Environmental Compliance
Enforcement Division
P.O. Box 4312
Baton Rouge, LA 70821-4312
Attention: Antoinette Cobb

LOUISIANA DEPARTMENT OF ENVIRONMENTAL QUALITY
 OFFICE OF ENVIRONMENTAL COMPLIANCE
 ENFORCEMENT DIVISION CONSOLIDATED COMPLIANCE ORDER &
 POST OFFICE BOX 4312 NOTICE OF POTENTIAL PENALTY
 BATON ROUGE, LOUISIANA 70821-4312 REQUEST TO CLOSE



Enforcement Tracking No.	AE-CN-16-00273	Contact Name	Antoinette Cobb
Agency Interest (AI) No.	26003	Contact Phone No.	(225) 219-3072
Alternate ID No.	2520-00027		
Respondent:	Valero Refining-New Orleans, L.L.C.	Facility Name:	St. Charles Refinery
	c/o C T Corporation Services	Physical Location:	14902 River Road
	Agent for Service of Process		
	3867 Plaza Tower Drive	City, State, Zip:	Norco, Louisiana 70079
Baton Rouge, Louisiana 70816	Parish:	St. Charles	

STATEMENT OF COMPLIANCE

STATEMENT OF COMPLIANCE	Date Completed	Copy Attached?
A written report was submitted in accordance with Paragraph V of the "Order" portion of the COMPLIANCE ORDER.		
All necessary documents were submitted to the Department within 30 days of receipt of the COMPLIANCE ORDER in accordance with Paragraph(s) II of the "Order" portion of the COMPLIANCE ORDER.		
All necessary documents were submitted to the Department within 45 days of receipt of the COMPLIANCE ORDER in accordance with Paragraph(s) IV of the "Order" portion of the COMPLIANCE ORDER.		
All necessary documents were submitted to the Department within 60 days of receipt of the COMPLIANCE ORDER in accordance with Paragraph(s) III of the "Order" portion of the COMPLIANCE ORDER.		
All items in the "Findings of Fact" portion of the COMPLIANCE ORDER were addressed and the facility is being operated to meet and maintain the requirements of the "Order" portion of the COMPLIANCE ORDER. Final compliance was achieved as of:		

SETTLEMENT OFFER (OPTIONAL)

(check the applicable option)

<input type="checkbox"/>	The Respondent is not interested in entering into settlement negotiations with the Department with the understanding that the Department has the right to assess civil penalties based on LAC 33:1.Subpart1.Chapter7.
<input type="checkbox"/>	In order to resolve any claim for civil penalties for the violations in NOTICE OF POTENTIAL PENALTY (AE-CN-16-00273), the Respondent is interested in entering into settlement negotiations with the Department and would like to set up a meeting to discuss settlement procedures.
<input type="checkbox"/>	In order to resolve any claim for civil penalties for the violations in NOTICE OF POTENTIAL PENALTY (AE-CN-16-00273), the Respondent is interested in entering into settlement negotiations with the Department and offers to pay \$ _____ which shall include LDEQ enforcement costs and any monetary benefit of non-compliance. <ul style="list-style-type: none"> • Monetary component = \$ _____ • Beneficial Environmental Project (BEP) component (optional)= \$ _____ • DO NOT SUBMIT PAYMENT OF THE OFFER WITH THIS FORM- the Department will review the settlement offer and notify the Respondent as to whether the offer is or is not accepted.
<input type="checkbox"/>	The Respondent has reviewed the violations noted in NOTICE OF POTENTIAL PENALTY (AE-CN-16-00273) and has attached a justification of its offer and a description of any BEPs if included in settlement offer.

CERTIFICATION STATEMENT		
<p><i>I certify, under provisions in Louisiana and United States law that provide criminal penalties for false statements, that based on information and belief formed after reasonable inquiry, the statements and information attached and the compliance statement above, are true, accurate, and complete. I also certify that I do not owe outstanding fees or penalties to the Department for this facility or any other facility I own or operate. I further certify that I am either the Respondent or an authorized representative of the Respondent.</i></p>		
Respondent's Signature	Respondent's Printed Name	Respondent's Title
Respondent's Physical Address	Respondent's Phone #	Date
MAIL COMPLETED DOCUMENT TO THE ADDRESS BELOW:		
Louisiana Department of Environmental Quality Office of Environmental Compliance Enforcement Division P.O. Box 4312 Baton Rouge, LA 70821 Attn: Antoinette Cobb		